

EXHIBIT 18

(To the Declaration of Diana Rausa)

FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIM S. ADLER, P.C. AND JIM
ADLER,

Plaintiffs,

VS.

MCNEIL CONSULTANTS, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
QUINTESSA MARKETING, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
AND LAUREN MINGEE,

Defendants.

CIVIL ACTION NO.
3:19-CV-02025-K-BN

ORAL AND VIDEOTAPED DEPOSITION OF
MICHAEL WALKER
SEPTEMBER 28, 2022

REPORTED BY : Therese J. Casterline

JOB NO. 217612

1
2 ORAL AND VIDEOTAPED DEPOSITION of
3 MICHAEL WALKER, produced as a witness at the instance
4 of the Plaintiffs, and duly sworn, was taken in the
5 above-styled and -numbered cause on the 28th of
6 September, 2022, from 9:36 a.m. to 4:03 p.m., before
7 Therese J. Casterline, CSR in and for the State of
8 Texas, reported by machine shorthand, at the offices
9 of Lynn Pinker Hurst & Schwegmann LLP, 2100 Ross
10 Avenue, Suite 2700, in the City of Dallas, County of
11 Dallas, State of Texas, pursuant to the Federal Rules
12 of Civil Procedure and the provisions stated on the
13 record.

A P P E A R A N C E S

FOR THE PLAINTIFFS:

Jered Matthysse, Esq.
Giulio Yaquinto, Esq.
Pirkey Barber
1801 East 6th Street
Austin, TX 78702

FOR THE DEFENDANTS:

Rebecca Adams, Esq.
Barira Munshi, Esq.
Lynn Pinker Hurst & Schwegmann
2100 Ross Avenue
Dallas, TX 75201

ALSO PRESENT:

Ms. Erica Taylor, Videographer

I N D E X

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Appearances

3

WITNESS: MICHAEL WALKER

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9

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EXHIBITS

NUMBER

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QUINTESSA_002595

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20 New Jobs in Oklahoma City

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Exhibit 110 9-14-20 Walker email to Mott
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P R O C E E D I N G S

THE VIDEOGRAPHER: This is the start of media labeled number 1 of the video-recorded deposition of Michael Walker, in the matter of Jim S. Adler, PC, versus McNeil Consultants and others, in the court of the United States District Court for the Northern District of Texas, Dallas Division, Number 3:19-CV-02025-K-BN.

This deposition is being held at Lynn Pinker Hurst & Schwegmann at 2100 Ross Avenue, Dallas, Texas 75201, on September 28th, 2022, at approximately 9:36 a.m.

My name is Erica Taylor. I'm the Legal Video Specialist from TSG Reporting, Incorporated, headquartered at 228 East 45th Street, Suite 810, New York, New York 10017.

The court reporter is Therese Casterline in association with TSG Reporting.

Counsel, please introduce yourselves.

MR. MATTHYSSE: Jered Matthyse with

1 WALKER

2 Pirkey Barber on behalf of plaintiffs.

3 MR. YAQUINTO: Giulio Yaquinto, also
4 from Pirkey Barber on behalf of
5 plaintiffs.

6 MS. ADAMS: Rebecca Adams on behalf of
7 Defendants with Lynn Pinker Hurst &
8 Schwegmann.

9 THE VIDEOGRAPHER: Okay.

10 MS. MUNSHI: Barira Munshi, also with
11 Lynn Pinker Hurst & Schwegmann.

12 THE VIDEOGRAPHER: Okay. Will the
13 court reporter please swear in the witness.

14 MICHAEL WALKER,
15 having been first duly sworn, testified as follows:

16 EXAMINATION

17 BY MR. MATTHYSSE:

18 Q. Good morning.

19 A. Good morning.

20 Q. Could you state your full name for the
21 record.

22 A. Michael Gene Walker.

23 Q. Mr. Walker, have you been deposed
24 before?

25 A. I have.

1 WALKER

2 A. Yes.

3 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 A. Yes.

23 Q. Did you ever -- did Jason Love ever
24 raise this with you, this issue?

25 A. No.

1 WALKER

2 not on a desktop?

3 A. Cell phones are -- you know, it's --
4 they're -- they're a new appendage to -- to the
5 body nowadays, so most of them are doing their
6 search, making that call from their -- just
7 immediately.

8 Q. Okay. And while wall -- they're still
9 on the call rather than getting off the call to
10 sign it?

11 A. Yeah. So, I mean, it's just that --
12 it's just the -- the quality of service. It's
13 just -- it's just an added feature to the
14 service.

15 Q. Okay. Have you done any research,
16 like you had before as to the email leads, as to
17 the likelihood that that person becomes a lead if
18 they do sign off -- off the phone?

19 A. Yeah. I mean, getting them to
20 actually sign the -- the agreement is -- is kind
21 of like getting them caught in. They -- they're
22 brought in at that point.

23 Q. Yeah.

24 A. It just helps -- it just help -- helps
25 the lead stick.

1 WALKER

2 Q. Can you recall who you told that to?

3 A. No.

4 Q. So now we -- we've seen at least a --
5 three times in which a client law firm has
6 claimed that a PC has thought they were signing
7 with someone else.

8 At that point in time, in
9 September 2020, a few months after starting at
10 Quintessa, did that concern you?

11 A. No, it did not. [REDACTED] received
12 hundreds and hundreds of leads from us, and we
13 send thousands of leads.

14 So, to me, it's -- it's a -- that's
15 just a very small percentage.

16 Q. Just the cost of doing business?

17 A. Yeah.

18 MS. ADAMS: Objection, form.

19 A. I mean, not the cost -- I -- I say --

20 Q. That's at least --

21 A. Well --

22 Q. There's no pending question.

23 A. -- let me --

24 Q. There's no pending question.

25 I'm going to hand you, Mr. Walker,

1 WALKER

2 hanging us up -- hanging up on us after finding
3 out we're Jim Adler.

4 Do you see that?

5 A. I do.

6 Q. Okay. And do you recall how -- if you
7 talked to [REDACTED] about that?

8 A. I don't recall.

9 Q. Okay. Do you recall if you ever
10 responded to [REDACTED]

11 A. I do not. We had weekly
12 conversations. They received a lot of leads as
13 well.

14 Q. Okay. And, again, sitting here today,
15 this instance where you said that the PC was
16 confused and [REDACTED] forwarded that email to you,
17 does that concern or surprise you?

18 A. No, it doesn't. I mean, it -- I
19 can -- by -- by reading this, it just seems that
20 maybe I did listen to the call, didn't say
21 anything about an attorney.

22 Q. Okay. But you said, it looks like the
23 PC was confused, though, right?

24 A. Because the process is to -- to do
25 the -- the search, so listen to the call, talk

1 WALKER

2 Q. Okay. On page 1237, [REDACTED], a
3 partner at [REDACTED] says to Lauren in the second
4 full paragraph that, we've had numerous clients
5 inform us that they were misled into signing the
6 contract with our firm. The clients believed
7 they were signing with another firm not ours. As
8 you might imagine, this type of issue could
9 expose our firm to all sorts of claims.

10 When you -- do you recall whether or
11 not you were surprised or concerned by that when
12 you received it?

13 A. I don't recall.

14 Q. Okay.

15 A. I mean, anytime somebody wants to --
16 to -- to leave is -- is concerning.

17 Q. Okay. So that -- that part of it
18 definitely concerns you?

19 A. The -- the leaving does, yes.

20 Q. Yeah. On the very first page, 1234,
21 [REDACTED] after some exchanges, emails back
22 to Lauren, with yourself cc'd -- that's you there
23 in the cc, correct?

24 A. Yes.

25 Q. -- on November 12th, 2021. And he

1 WALKER

2 says in the second paragraph, below are a list of
3 some clients who thought they were signing with
4 other entities.

5 Do you recall receiving that list?

6 A. Yes.

7 Q. Okay. And, again, you recall that it
8 was looked into by Quintessa, but that's all you
9 can recall sitting here today; is that right?

10 A. Yeah.

11 Q. Okay. And you can't recall what the
12 results of that investigation were?

13 A. I do not recall exactly.

14 Q. Okay. I'm handing you, Mr. Walker,
15 what will be marked as Exhibit 114.

16 (Exhibit Number 114 marked.)

17 Q. As you can see here, Mr. Walker, this
18 is an email from back -- going backwards again to
19 2020, in October.

20 Do you see that?

21 A. Yes.

22 Q. Okay. And that's from yourself to
23 Ms. Ramirez.

24 Do you see that?

25 A. Yes.

1 WALKER

2 A. I -- I can't.

3 Q. Okay. And those came after the Fifth
4 Circuit decision, correct?

5 A. Correct.

6 Q. Okay. Since the Fifth Circuit
7 decision, has there, in your personal experience,
8 been instances in which a client law firm has
9 alleged that a lead, a PC, thought they were
10 signing with a different law firm?

11 A. I've stepped back quite a bit.

12 Q. Okay.

13 A. So I -- I don't see as many. I -- I
14 did do the last discovery search, and it was
15 less.

16 Q. Okay. But still there?

17 A. Well, when I say -- when I say less,
18 it's not less of what attorneys were coming, but
19 less of seeing a name of -- of another
20 attorney.

21 Q. And -- and in that discovery, we'll --
22 I'm not trying to hide the ball -- we'll show you
23 a couple.

24 You do still see some, correct?

25 A. Yes.

ERRATA SHEET

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2 Case Name:

3 Deposition Date:

4 Deponent:

5 Pg. No. Now Reads Should Read Reason

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21 Signature of Deponent

22 SUBSCRIBED AND SWORN BEFORE ME

23 THIS ____ DAY OF _____, 2022.

24 _____

25 (Notary Public) MY COMMISSION EXPIRES: _____

J U R A T

I, _____, do hereby certify under
penalty of perjury that I have read the foregoing
transcript of my deposition taken on _____;
that I have made such corrections as appear noted
herein in ink, initialed by me; that my testimony as
contained herein, as corrected, is true and correct.

DATED this ____ day of _____, 2022,
at _____, _____.

SIGNATURE OF WITNESS

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIM S. ADLER, P.C. AND JIM)	
ADLER,)	
)	
Plaintiffs,)	
)	
VS.)	CIVIL ACTION NO.
)	3:19-CV-02025-K-BN
MCNEIL CONSULTANTS, LLC D/B/A)	
ACCIDENT INJURY LEGAL CENTER,)	
QUINTESSA MARKETING, LLC D/B/A)	
ACCIDENT INJURY LEGAL CENTER,)	
AND LAUREN MINGEE,)	
)	
Defendants.)	

REPORTER'S CERTIFICATION

ORAL AND VIDEOTAPED DEPOSITION OF MICHAEL WALKER
SEPTEMBER 28, 2022

I, Therese J. Casterline, Registered Merit
Reporter, Certified Realtime Reporter, Certified
Shorthand Reporter, do hereby certify that there
came before me on the 28th day of September,
2022, at the offices of Lynn Pinker Hurst &
Schwegmann LLP, located at 2100 Ross Avenue,
Suite 2700, Dallas, Texas, the following named
person, to wit: MICHAEL WALKER, who was duly
sworn to testify the truth, the whole truth, and

1
2 nothing but the truth of knowledge touching and
3 concerning the matters in controversy in this
4 cause; and that he was thereupon examined upon
5 his oath and his examination reduced to
6 typewriting under my supervision; that the
7 deposition is a true record of the testimony
8 given by the witness, that review by the witness
9 was requested on the record, and signature of the
10 witness is to be signed before any notary public.

11 I further certify that I am neither attorney
12 nor counsel for nor related to any of the parties
13 to the action in which this deposition is taken,
14 and further that I am not a relative or employee
15 of any attorney or counsel employed by the
16 parties hereto, or financially interested in this
17 action.

18 Given under my hand on this the 10th day of
19 October, 2022.

20 *Therese J. Casterline*

21 Therese J. Casterline, RMR, CRR, CSR
22 TSG Reporting - Worldwide
23 228 E. 45th Street, Suite 810
24 New York, New York 10017
25 (877) 702-9580

EXHIBIT 19

(To the Declaration of Diana Rausa)

FILED UNDER SEAL

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JULY 22, 2022

9:39 A.M.

Videotaped Deposition of JASON LOVE, held at
the Wyndham Grand, 10 North Broadway Avenue, Oklahoma
City, Oklahoma, before Kortney Houts, a Certified
Shorthand Reporter of the State of Oklahoma.

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A P P E A R A N C E S:

PIRKEY BARBER PLLC
Attorneys for Plaintiffs
BY: JERED MATTHYSSE, ESQ.
GIULIO YAQUINTO, ESQ.
1801 East 6th Street
Austin, Texas 78702

LYNN PINKER HURST & SCHWEGMANN, LLP
Attorney for Defendants
BY: REBECCA ADAMS, ESQ.
2100 Ross Avenue
Dallas, Texas 75201

VIDEOGRAPHER: Dan Willis - TSG Reporting

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IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties herein, that filing and sealing be and the same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED that all objections, except as to the form of the question, shall be reserved to the time of the trial.

IT IS FURTHER STIPULATED AND AGREED that the within deposition may be sworn to and signed before any officer authorized to administer an oath, with the same force and effect as if signed and sworn to before the Court.

1 J. LOVE

2 THE VIDEOGRAPHER: We are on the record for
3 the video recorded deposition of Jason Love in the
4 matter of Adler, et al., versus McNeil Consultants,
5 LLC, et al., filed in the United States District Court
6 for the Northern District of Texas, Dallas Division,
7 Case Number 3:19-CV-02025-K-BN. This deposition is
8 being held at 10 North Broadway Avenue in Oklahoma
9 City. The date is July 22nd, 2022. The time is
10 9:39 a.m. Central.

11 My name is Dan Willis. I am the legal video
12 specialist for TSG Reporting, Incorporated,
13 headquartered at 228 East 45th Street, Suite 810, New
14 York, New York. The court reporter is Kortney Houts in
15 association with TSG Reporting.

16 Counsel, please introduce yourselves.

17 MR. MATTHYSSE: Jered Matthysse with Pirkey
18 Barber on behalf of plaintiffs.

19 MR. YAQUINTO: Giulio Yaquinto, also with
20 Pirkey Barber on behalf of plaintiffs.

21 MS. ADAMS: Rebecca Adams with Lynn Pinker
22 Hurst & Schwegmann on behalf of the defendants and the
23 witness, Jason Love.

24 THE VIDEOGRAPHER: Will the court reporter
25 please swear in the witness.

1 J. LOVE

2 JASON W. LOVE,

3 called as a witness, having been duly sworn,

4 was examined and testified as follows:

5 EXAMINATION BY

6 MR. MATTHYSSE:

7 Q Good morning.

8 A Good morning.

9 Q Could you state your full name for the
10 record?

11 A Jason Woodrow Love.

12 Q Mr. Love, have you been deposed before?

13 A I have not.

14 Q Okay. And have you ever testified in any
15 capacity prior to today?

16 A Yes.

17 Q And where was that?

18 A An employment hearing.

19 Q And how many times was that?

20 A I don't recall.

21 Q Okay. Have you ever testified in a trademark
22 case prior to today?

23 A I have not.

24 Q Do you realize that you're fully under oath
25 and must answer all of my questions to the best of your

1 J. LOVE

2 ability?

3 A I do.

4 Q If my questions are unclear, just ask me to
5 clarify. Does that sound good?

6 A Sure. Yeah.

7 Q And if you need a break, just let me know,
8 and we can work one in. Does that sound good?

9 A Yeah.

10 Q Mr. Love, is there any condition or other
11 reason that you cannot give complete and accurate
12 testimony today?

13 A No.

14 Q Where do you currently live?

15 A Yukon, Oklahoma.

16 Q And what is your current occupation or job
17 title?

18 A I'm a lien transformation specialist with
19 Mercy Hospital.

20 Q Mr. Love, I'm going to hand you what will be
21 marked as --

22 MR. MATTHYSSE: Let's actually start at 58.

23 Q -- Exhibits 58 and 59.

24 A Okay.

25 MR. MATTHYSSE: That's 58 and then 59.

1 J. LOVE

2 Q Yes.

3 A I don't recall her ever asking if anybody was
4 ever calling in specifically --

5 Q Okay.

6 A -- for any particular law firm.

7 Q Okay. Did Lauren ever tell you why the
8 phrase "intake department" was chosen to be said as the
9 first phrase when the intake department identifies
10 themselves to consumers?

11 A Not that I recall, no.

12 Q Do you have any understanding of why that
13 would -- that phrase would be chosen over other
14 phrases?

15 A No.

16 Q Did you ever have any concern about that
17 phrase potentially misleading callers?

18 A I was -- I was assured that the scripting
19 that we had would keep us within the legal -- you know,
20 legal bounds. So I wanted to make sure that we
21 stayed -- you know, stayed there. So that was my
22 understanding, so that's what we stuck with.

23 Q Okay. But were you personally ever concerned
24 that that phrase might mislead consumers?

25 A Intake department? Personally, yeah.

1 J. LOVE

2 family. Do you see that?

3 A I do.

4 Q Would you agree that it was, during your time
5 there, fast-paced?

6 A Yes.

7 Q And to your understanding, what made it
8 fast-paced?

9 A There's just always something to do. You can
10 always find something to do. You don't ever have to
11 just sit.

12 Q Did any of your -- is it true that the intake
13 specialists, the call center agents reported to you?

14 A Yes.

15 Q Did any of them report instances of a caller
16 calling in looking for a non-client law firm?

17 A I don't know that anybody reported it. I
18 mean, it was known.

19 Q Okay. It was known that that happened at the
20 company?

21 A Yes.

22 Q I'm handing you, Mr. Love, what will be
23 marked as Exhibit 63.

24 (Exhibit 63, e-mail Bates stamped

25 Quintessa 002374 through Quintessa 002378, marked

1 J. LOVE

2 any changes made to the script after the appeal came
3 back down to the district court?

4 A No, I don't.

5 MS. ADAMS: Those are the only questions I
6 have.

7 MR. MATTHYSSE: No further questions from our
8 side.

9 THE VIDEOGRAPHER: We're off the record at
10 2:33 p.m.

11 THE COURT REPORTER: Read and sign?

12 MS. ADAMS: Yes, please.

13 (Deposition concluded at 2:33 p.m.)

14

15

16

17

18

19

20

JASON LOVE

21

22 Subscribed and sworn to before me

23 this _____ day of _____, 2022.

24

25 _____

1
2 CERTIFICATE3
4 State of Oklahoma)
5 County of Oklahoma) SS:
6

7 I, Kortney V. Houts, a Certified Shorthand
8 Reporter for the State of Oklahoma, certify that JASON
9 LOVE, was duly sworn by me to testify to the truth;
10 that the videotaped deposition was taken by me in
11 stenotype and thereafter transcribed by computer and is
12 a true and correct transcript of the testimony of the
13 witness; that the deposition totaling 166 pages was
14 taken by me on July 22, 2022, at 9:39 a.m., at 10 N.
15 Broadway Avenue, Oklahoma City, Oklahoma; that I am not
16 a relative, employee, attorney or counsel to any party
17 in this case or a relative or employee to any counsel
18 in this case or otherwise financially interested in
19 this action; and that the witness elected to exercise
20 his right to review the deposition transcript prior to
21 its filing.

22 Witness my hand and seal of office on this 3rd
23 day of August, 2022.



24 KORTNEY V. HOUTS, CSR
Oklahoma Certified Shorthand Reporter
25 Certificate No. 1804
Exp. Date: December 31, 2022

ERRATA SHEET

Case Name:

Deposition Date:

Deponent:

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Signature of Deponent

SUBSCRIBED AND SWORN BEFORE ME

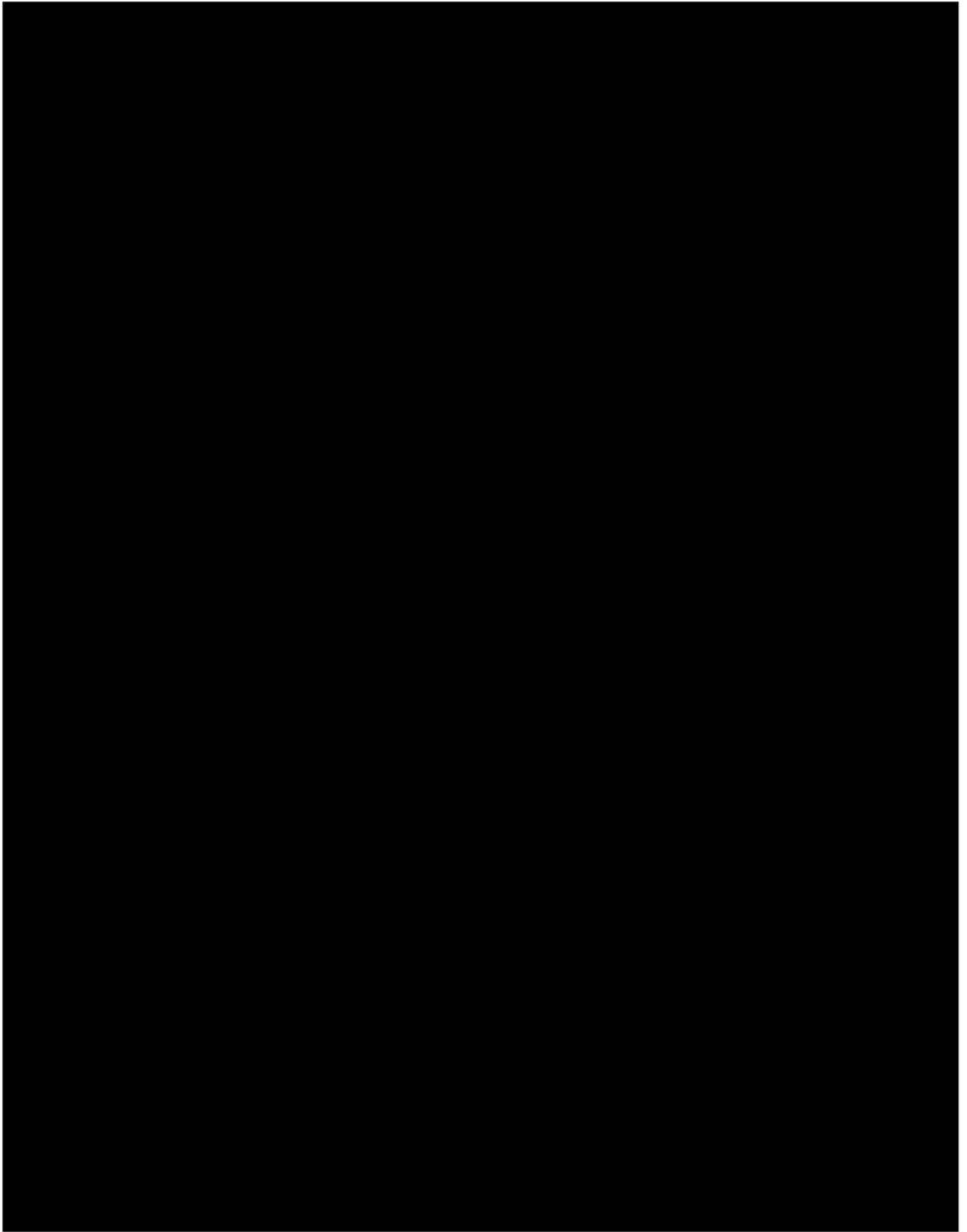
THIS ____ DAY OF _____, 2022.

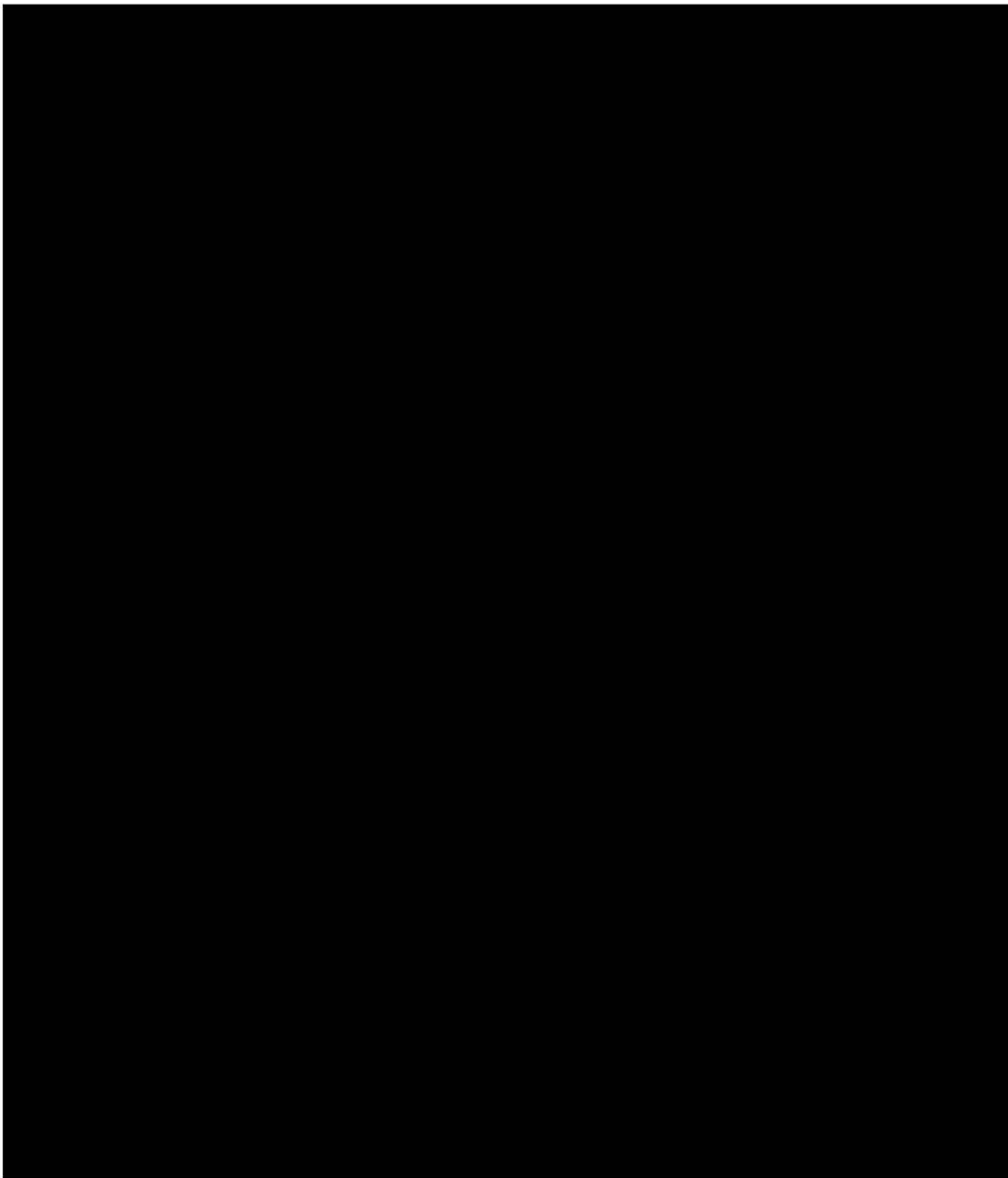
(Notary Public) MY COMMISSION EXPIRES: _____

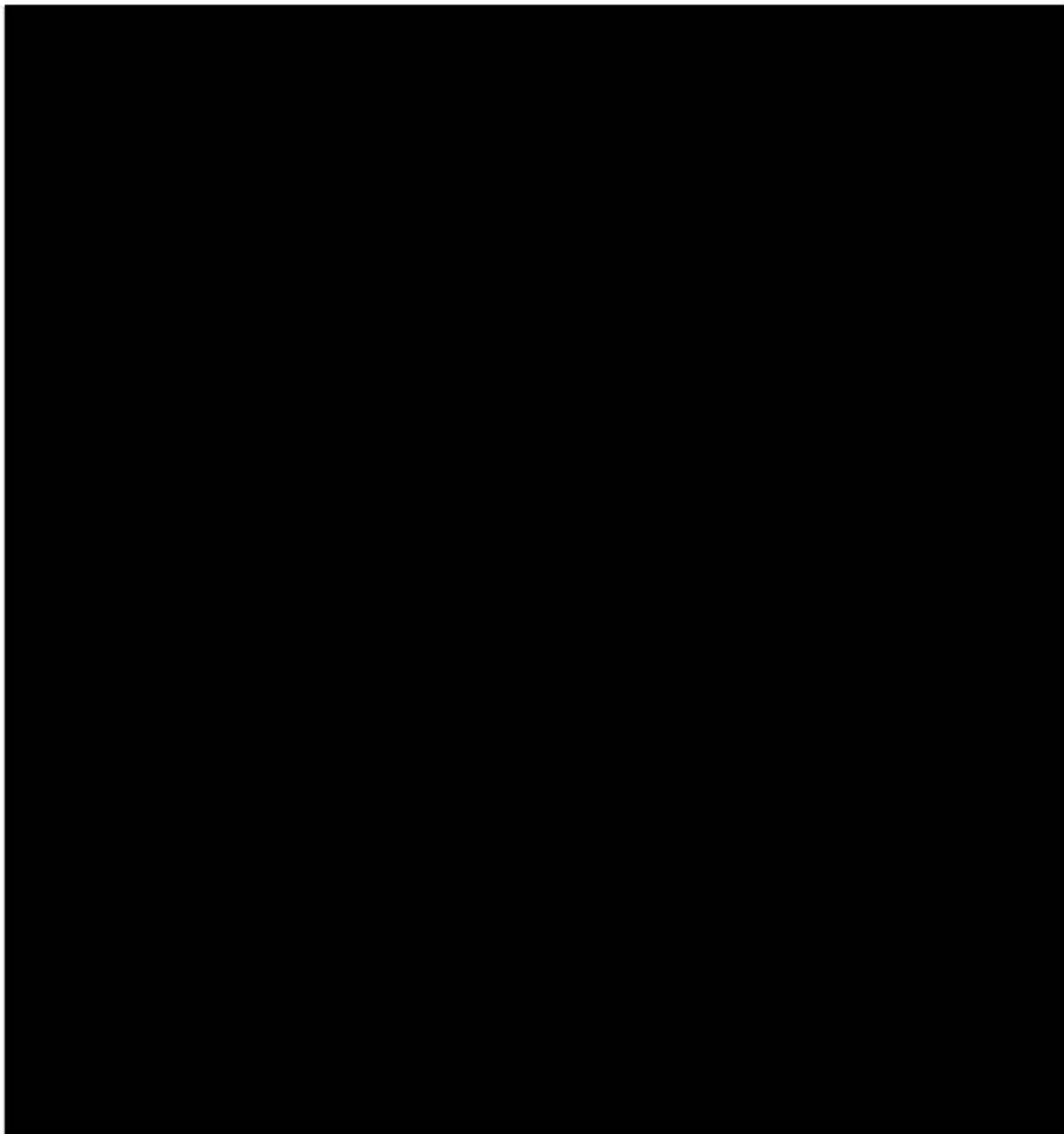
EXHIBIT 20

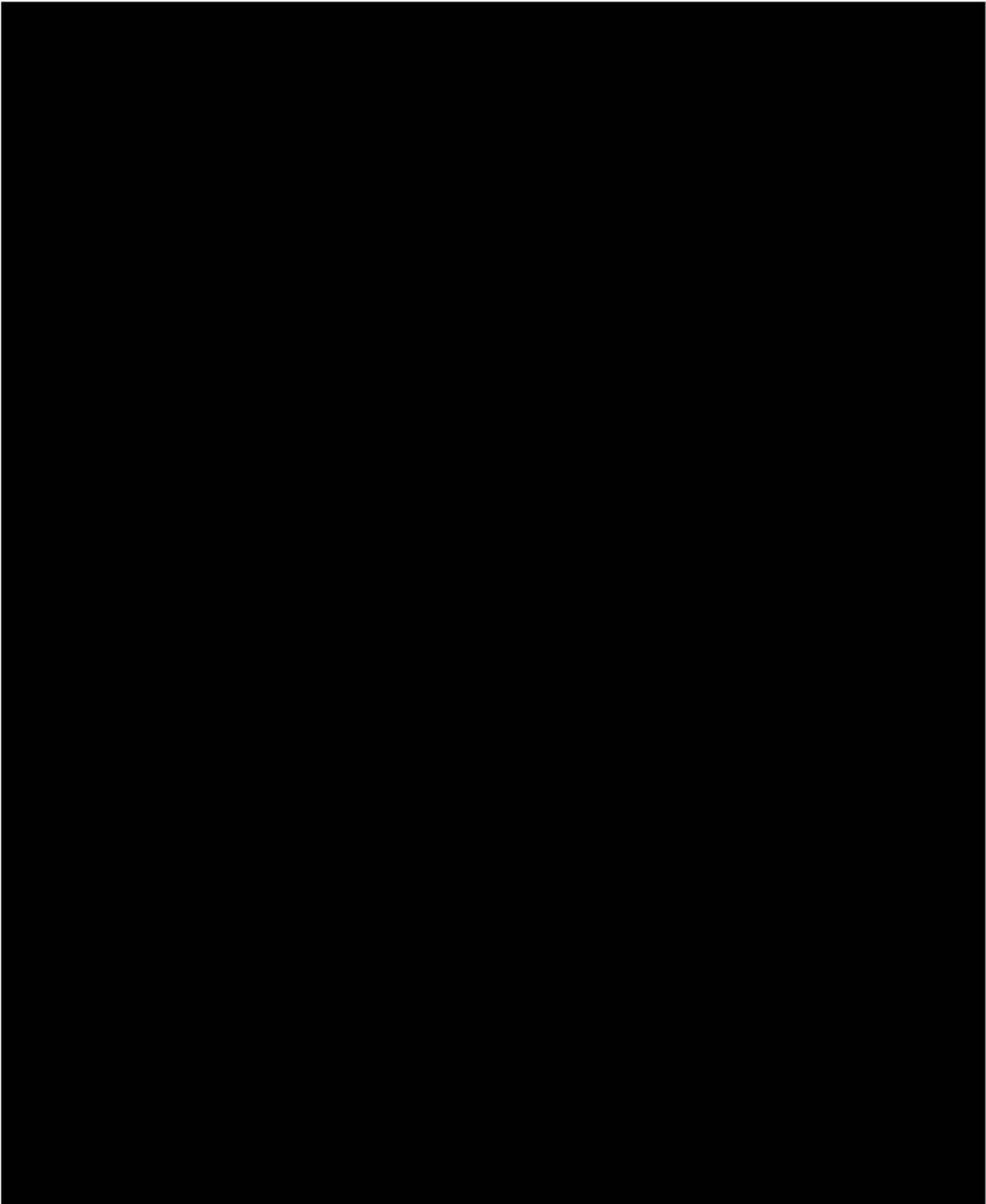
(To the Declaration of Diana Rausa)

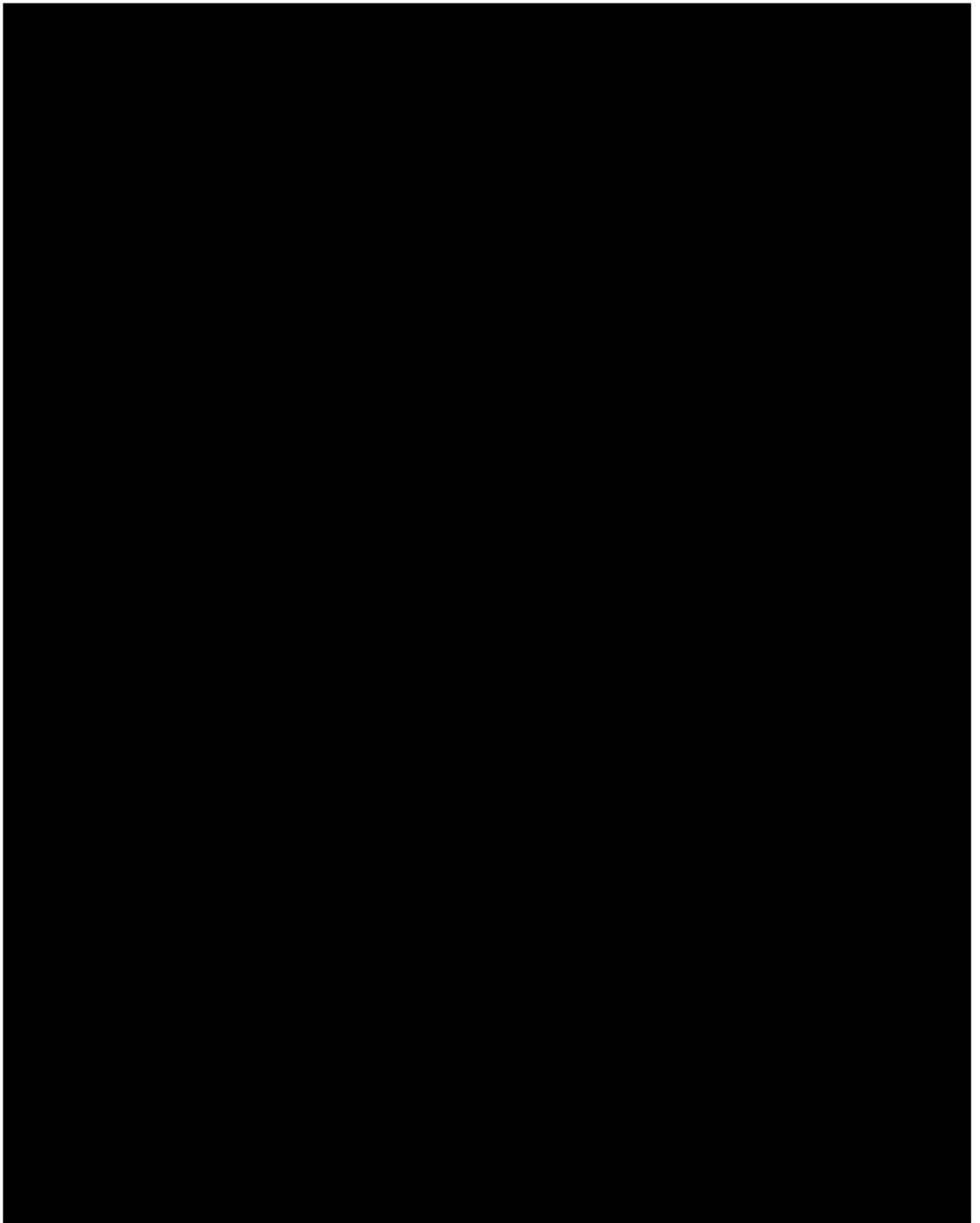
FILED UNDER SEAL













AUTHORIZATION TO DISCLOSE PROTECTED HEALTH INFORMATION

Developed for Texas Health & Safety Code § 181.154(d)
effective January 1, 2013

Please read this entire form before signing and complete all the sections that apply to your decisions relating to the disclosure of protected health information. Covered entities as that term is defined by HIPAA and Texas Health & Safety Code § 181.001 must obtain a signed authorization from the individual or the individual's legally authorized representative to electronically disclose that individual's protected health information. Authorization is not required for disclosures related to treatment, payment, health care operations, performing an insurance or health maintenance organization function, or as may be otherwise authorized by law. **Covered entities may use this form or any other form that complies with HIPAA, the Texas Medical Privacy Act, and other applicable laws.** Individuals cannot be denied treatment based on a failure to sign this authorization form, and a refusal to sign this form will not affect the payment, enrollment, or eligibility of benefits.

NAME OF PATIENT OR INDIVIDUAL

[REDACTED]

I AUTHORIZE THE FOLLOWING TO DISCLOSE THE INDIVIDUAL'S PROTECTED HEALTH INFORMATION:

Person/Organization Name _____
Address _____
City _____ State _____ Zip Code _____
Phone (____) _____ Fax (____) _____

WHO CAN RECEIVE AND USE THE HEALTH INFORMATION?

Person/Organization Name _____
Address _____
City _____ State _____ Zip Code _____
Phone (____) _____ Fax (____) _____

REASON FOR DISCLOSURE (Choose only one option below)

- ☐ Treatment/Continuing Medical Care
☐ Personal Use
☐ Billing or Claims
☐ Insurance
☐ Legal Purposes
☐ Disability Determination
☐ School
☐ Employment
☐ Other _____

WHAT INFORMATION CAN BE DISCLOSED? Complete the following by indicating those items that you want disclosed. The signature of a minor patient is required for these release of some of these items. If all health information is to be released, then check only the first box.

- | | | | |
|---|--|---|---|
| <input type="checkbox"/> All health information | <input type="checkbox"/> History/Physical Exam | <input type="checkbox"/> Past/Present Medications | <input type="checkbox"/> Lab Results |
| <input type="checkbox"/> Physician's Orders | <input type="checkbox"/> Patient Allergies | <input type="checkbox"/> Operation Reports | <input type="checkbox"/> Consultation Reports |
| <input type="checkbox"/> Progress Notes | <input type="checkbox"/> Discharge Summary | <input type="checkbox"/> Diagnostic Test Reports | <input type="checkbox"/> EKG/Cardiology Reports |
| <input type="checkbox"/> Pathology Reports | <input type="checkbox"/> Billing Information | <input type="checkbox"/> Radiology Reports & Images | <input type="checkbox"/> Other _____ |

Your initials are required to release the following information:

☐ M_Mental Health Records (excluding psychotherapy notes) ☐ M_Genetic Information (including Genetic Test Results)
☐ M_Drug, Alcohol, or Substance Abuse Records ☐ M_HIV/AIDS Test Results/Treatment

EFFECTIVE TIME PERIOD. This authorization is valid until the earlier of the occurrence of the death of the individual; the individual reaching the age of majority; or permission is withdrawn; or the following specific date (optional): Month _____ Day _____ Year _____.

RIGHT TO REVOKE. I understand that I can withdraw my permission at any time by giving written notice stating my intent to revoke this authorization to the person or organization named under "WHO CAN RECEIVE AND USE THE HEALTH INFORMATION." I understand that prior actions taken in reliance on this authorization by entities that had permission to access my health information will not be affected.

SIGNATURE AUTHORIZATION. I have read this form and agree to the uses and disclosures of the information as described. I understand that refusal to sign this form does not stop disclosure of health information that has occurred prior to revocation or that is otherwise permitted by law without my specific authorization or permission, including disclosures to other covered entities as provided by Texas Health & Safety Code § 181.154(c) and/or 45 C.F.R. § 164.506(a)(1). I understand that information disclosed pursuant to this authorization may be subject to re-disclosure by the recipient and may no longer be protected by federal or state privacy laws.

[REDACTED]

Signature of Individual or Individual's Legally Authorized Representative

06/09/2021

DATE

Printed Name of Legally Authorized Representative (if applicable): _____
If representative, specify relationship to the individual: ☐ Parent of minor ☐ Guardian ☐ Other _____

A minor individual's signature is required for the release of certain types of information, including for example, the release of information related to certain types of reproductive care, sexually transmitted diseases, and drug, alcohol or substance abuse, and mental health treatment (See, e.g., Tex. Fam Code § 32.003).

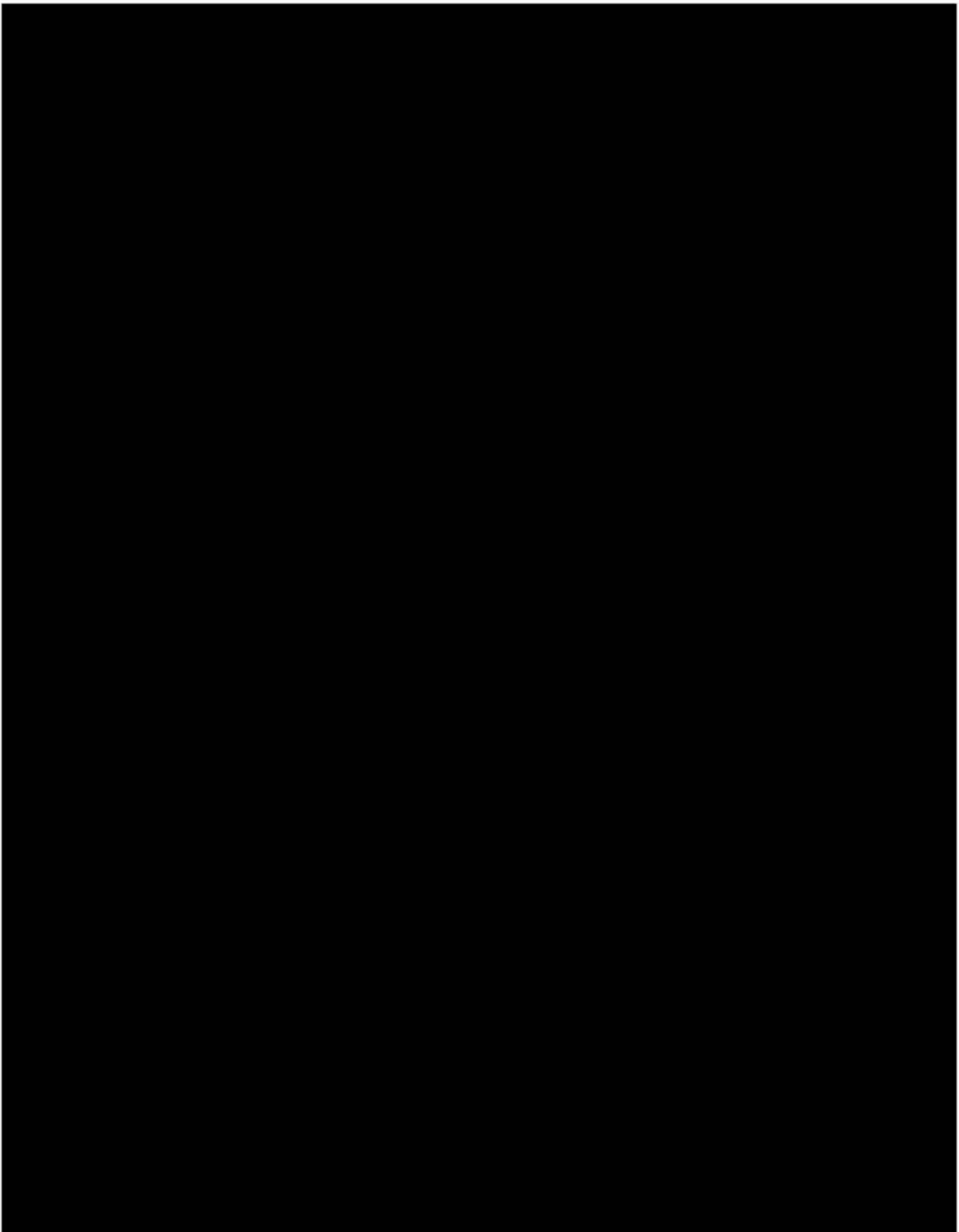
Signature of Minor Individual

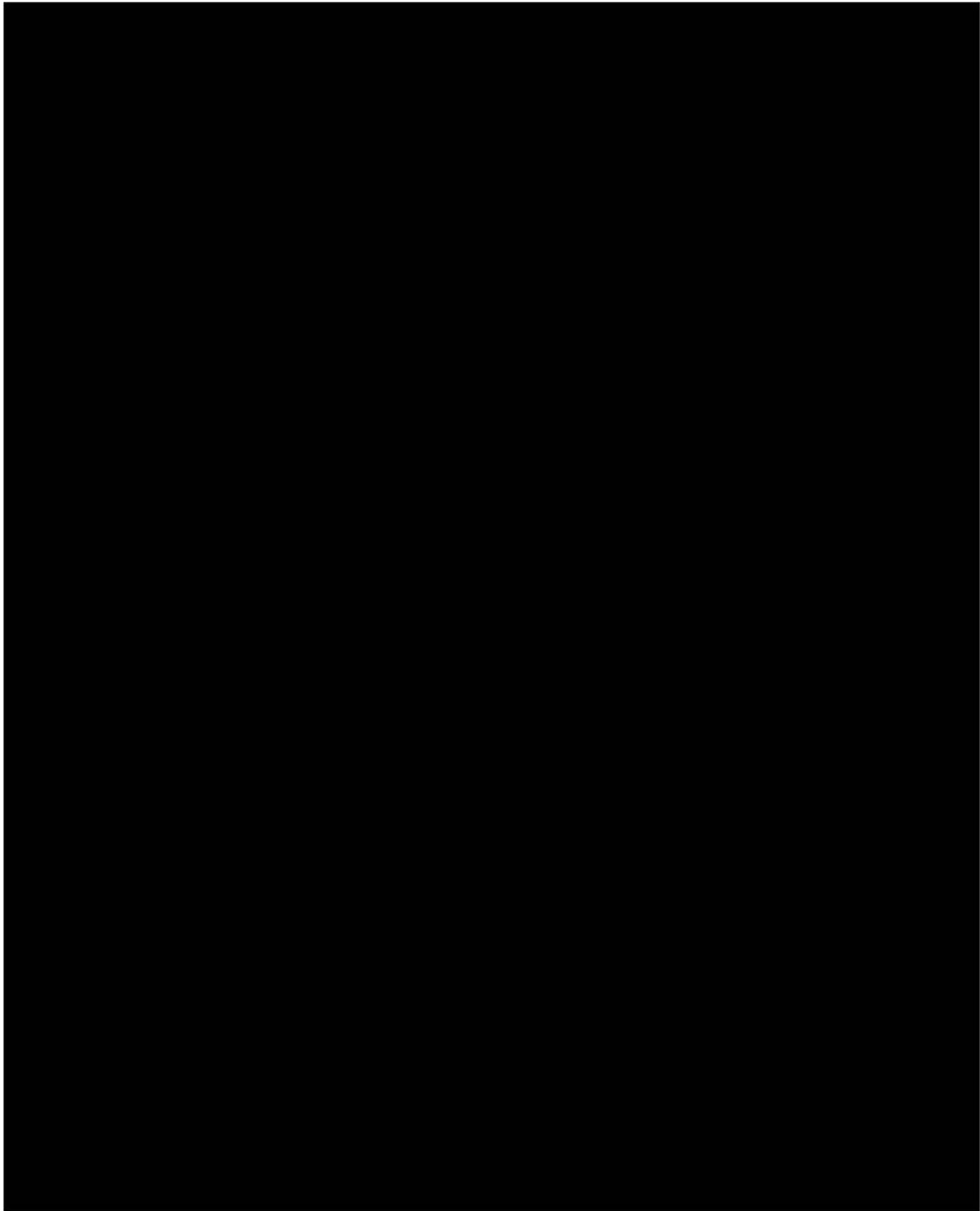
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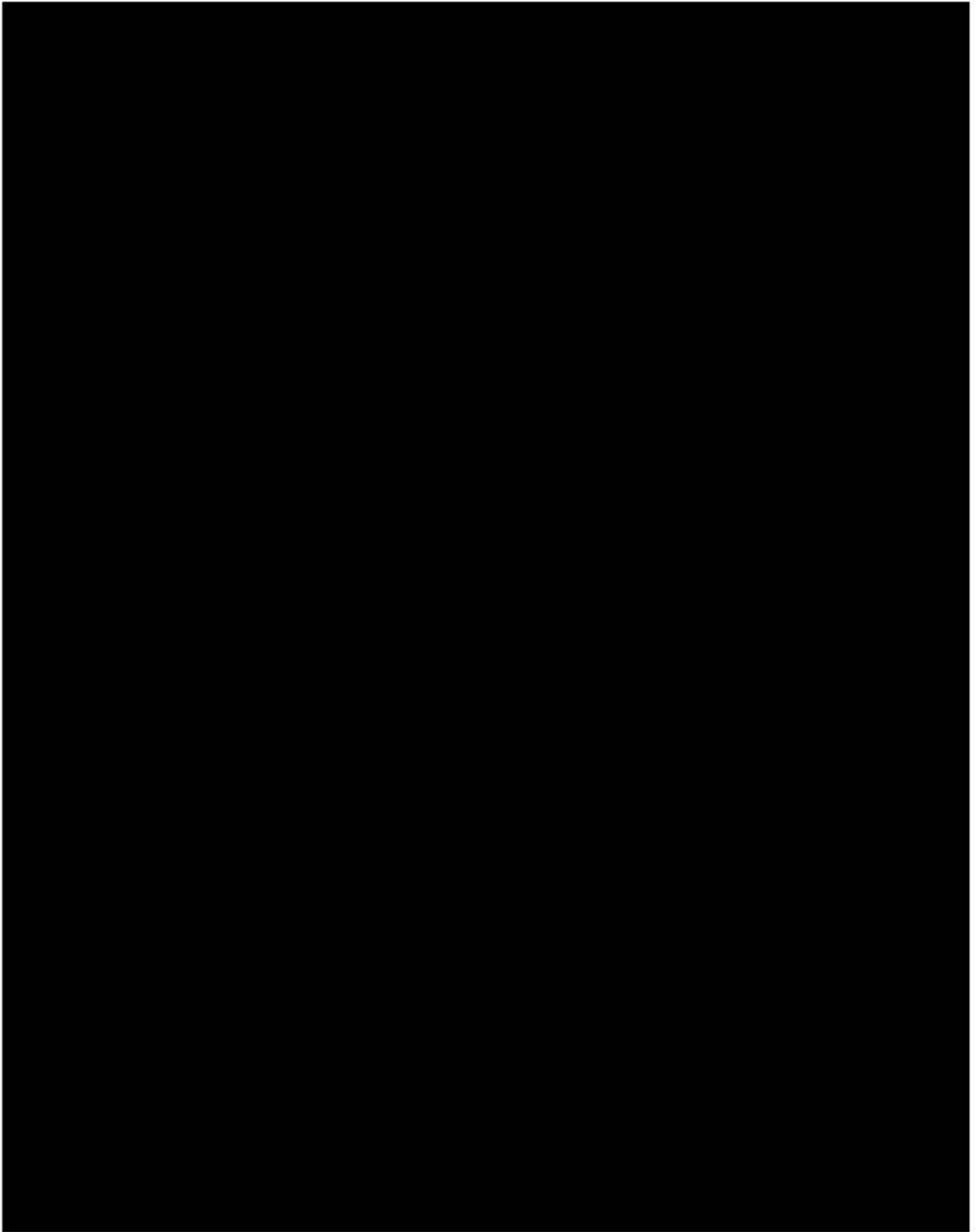
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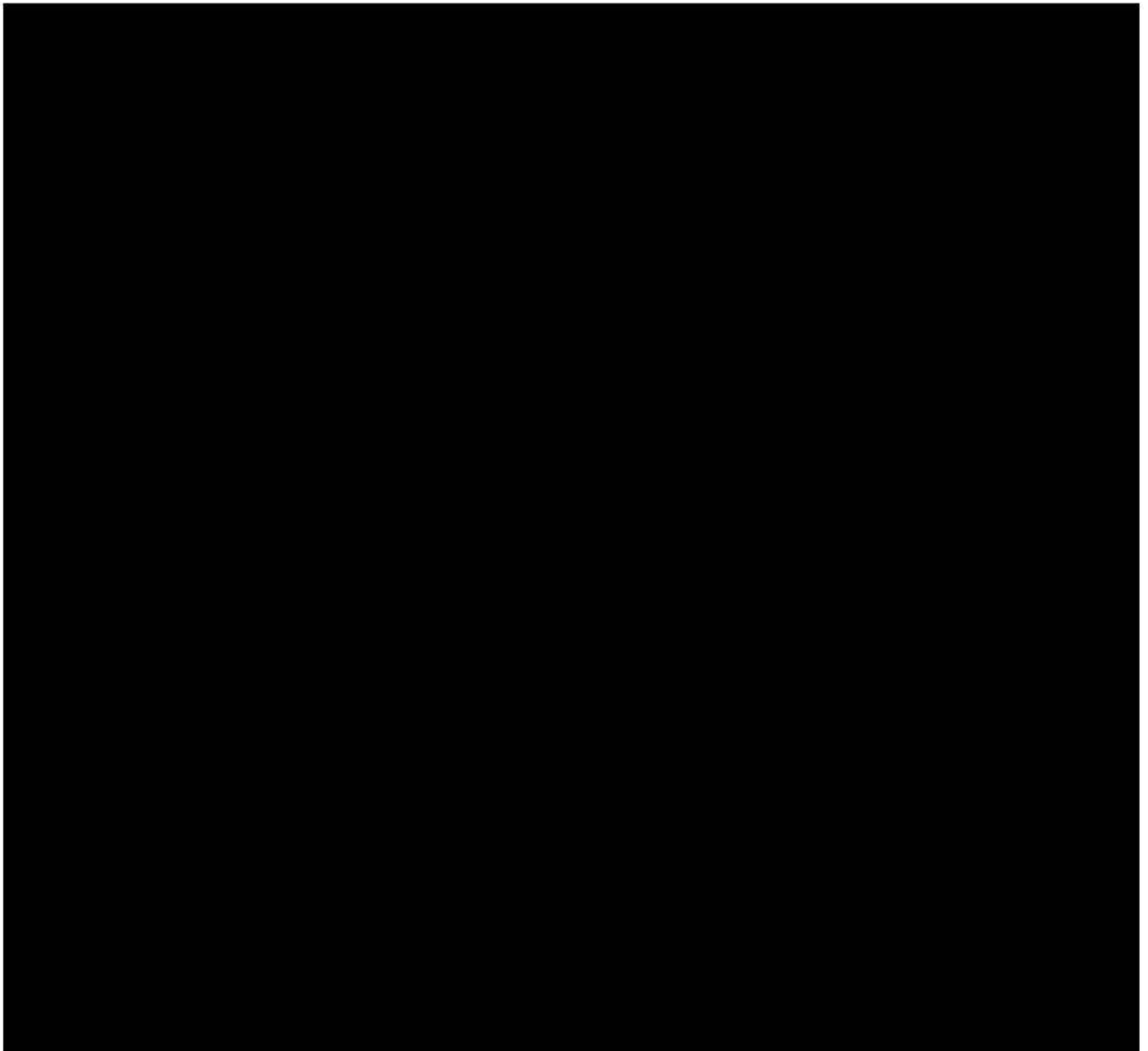
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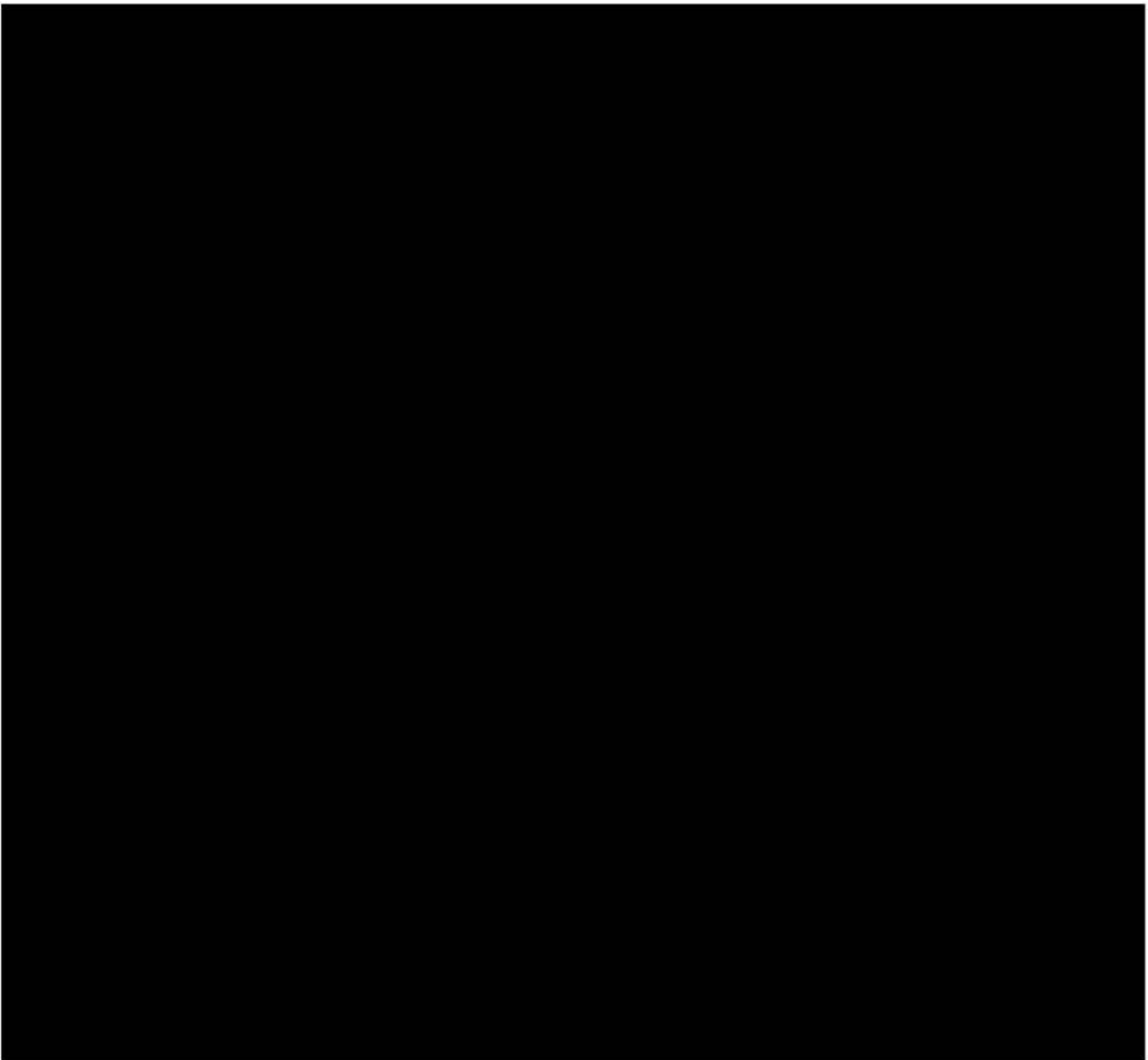
Appx. 337

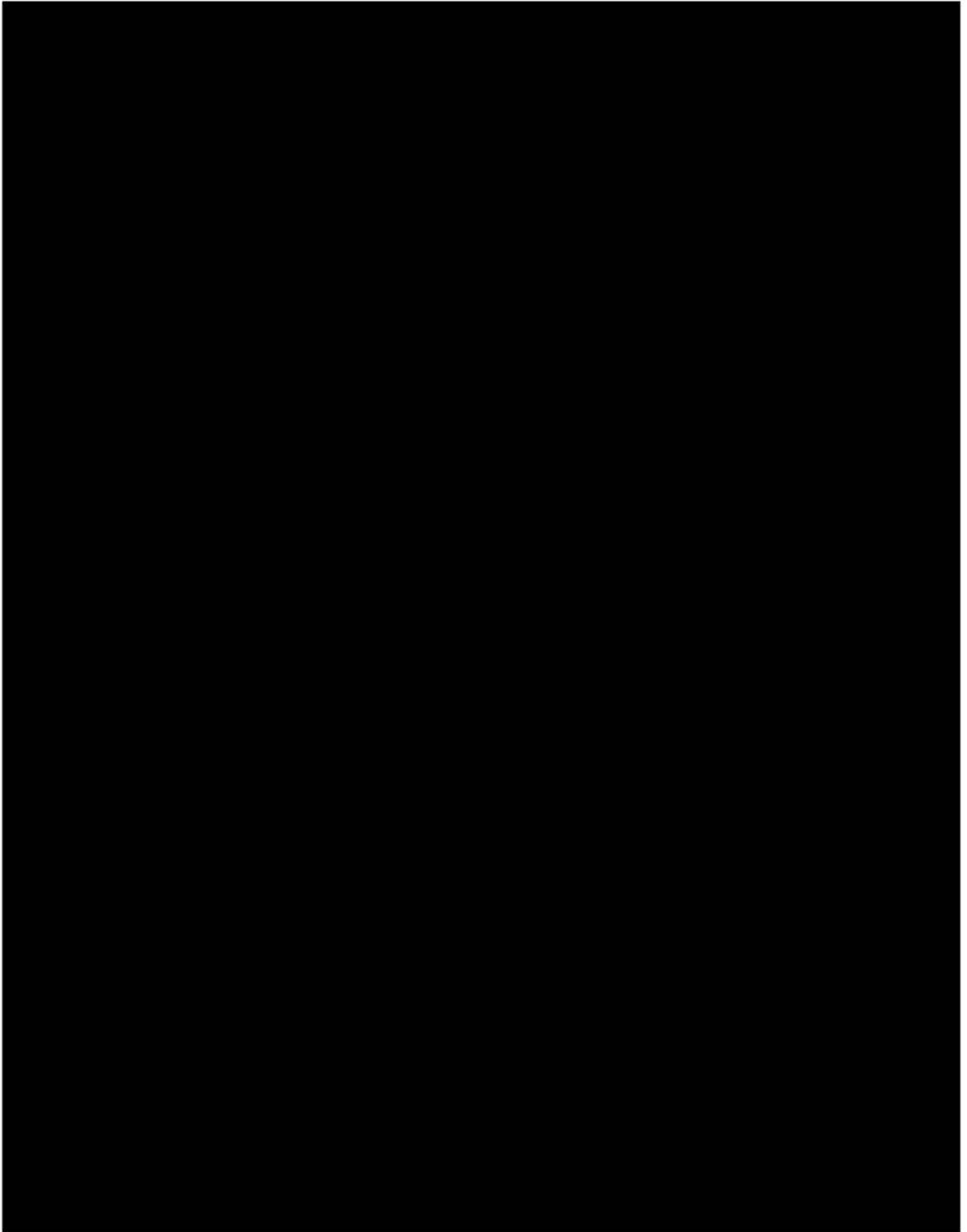


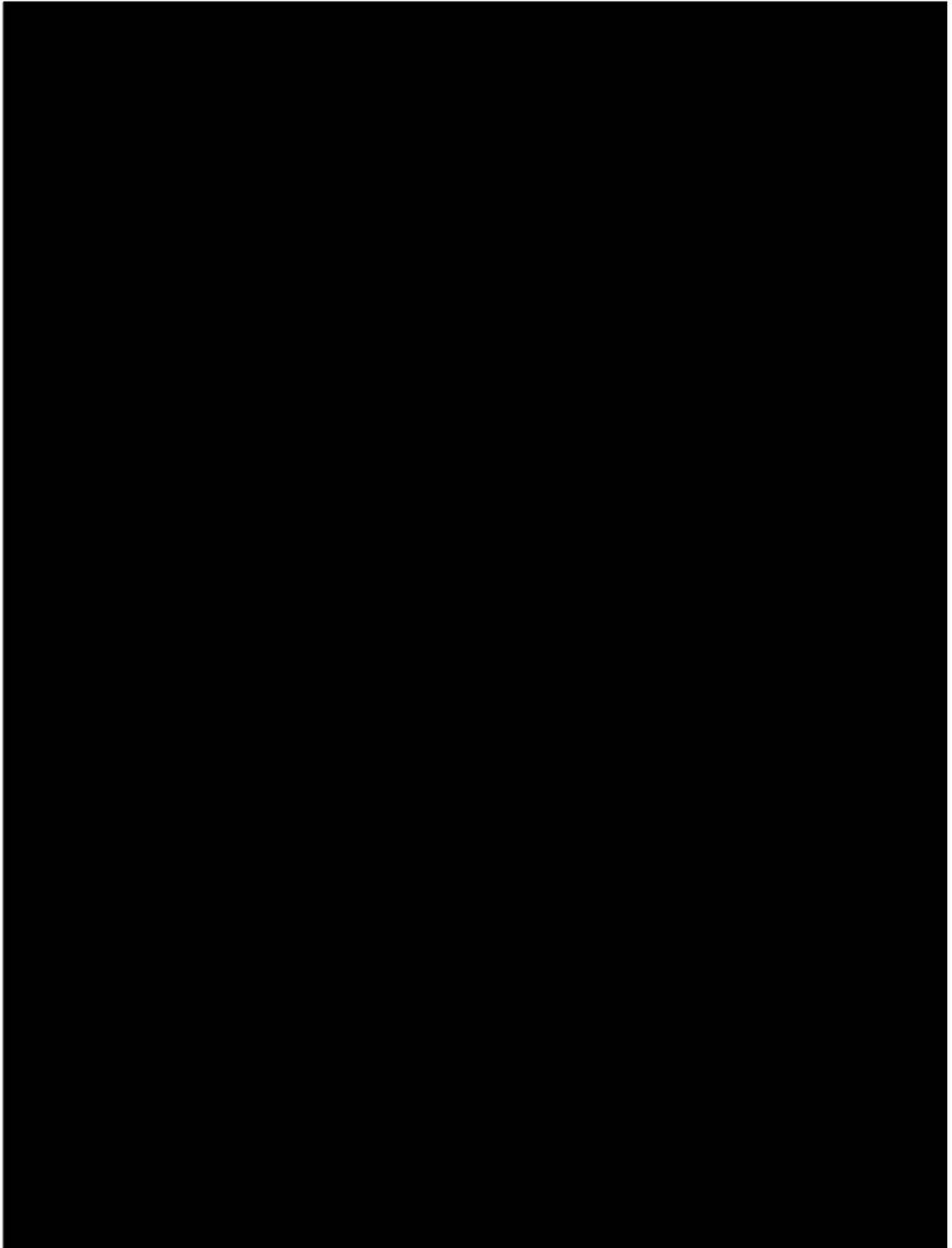


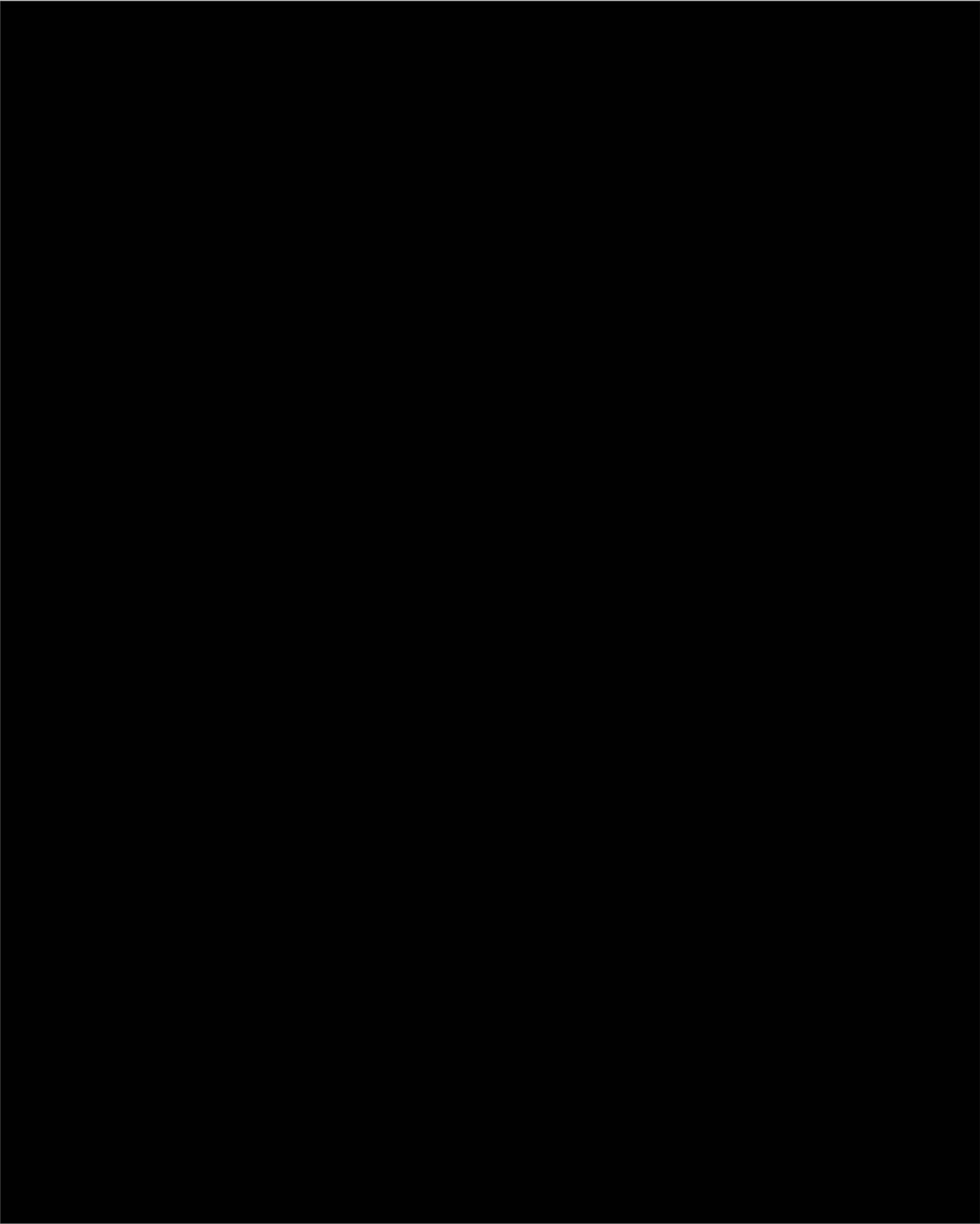


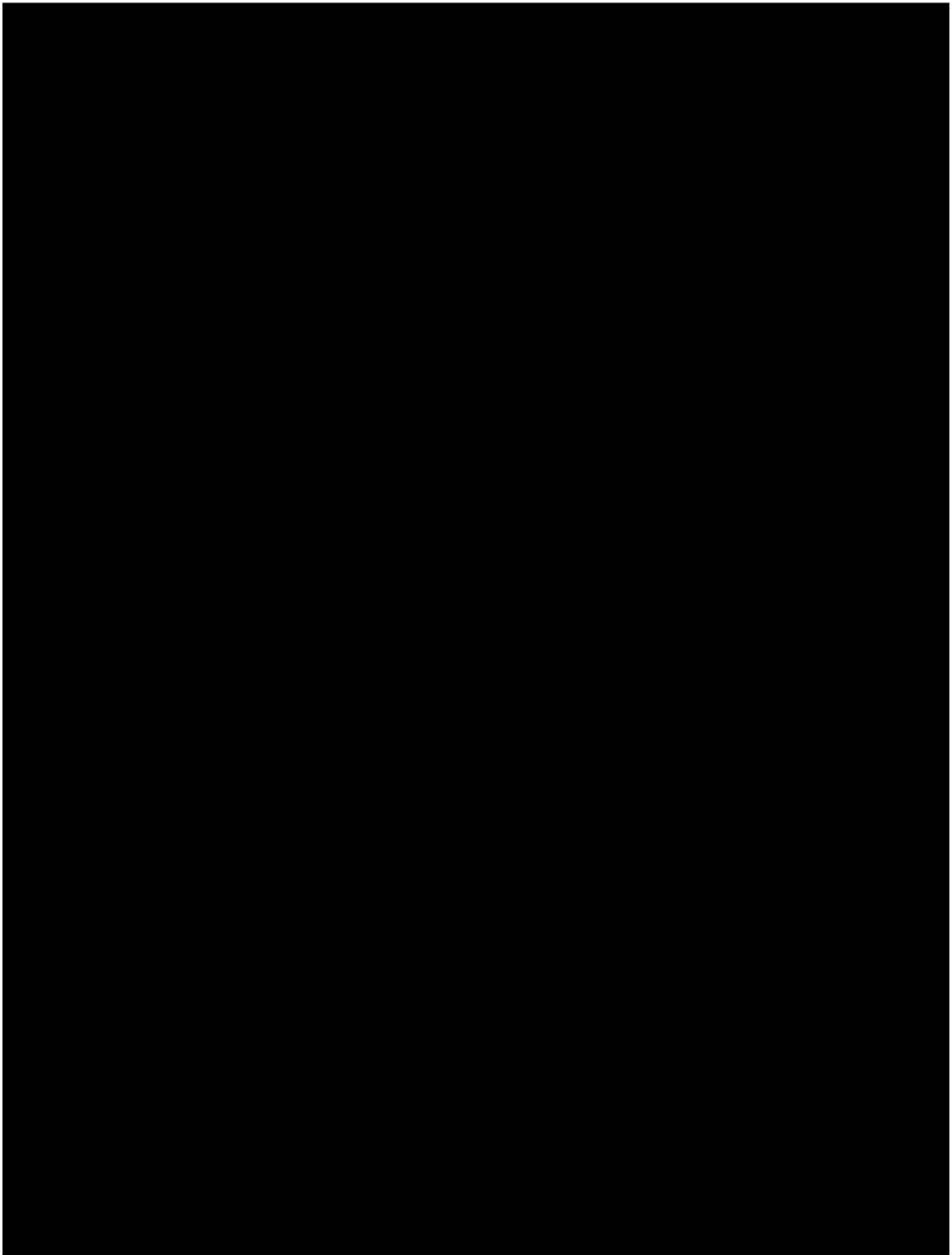


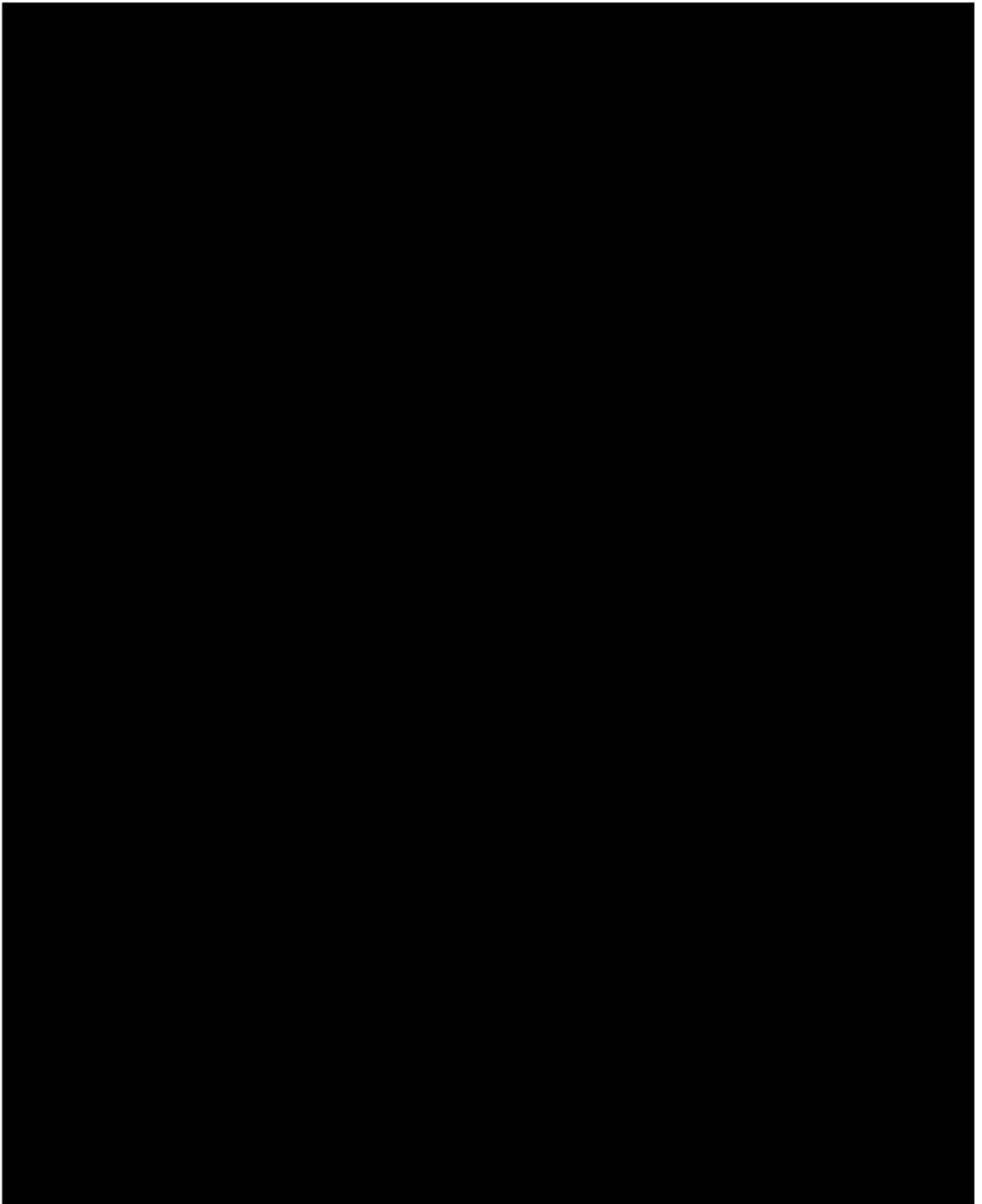


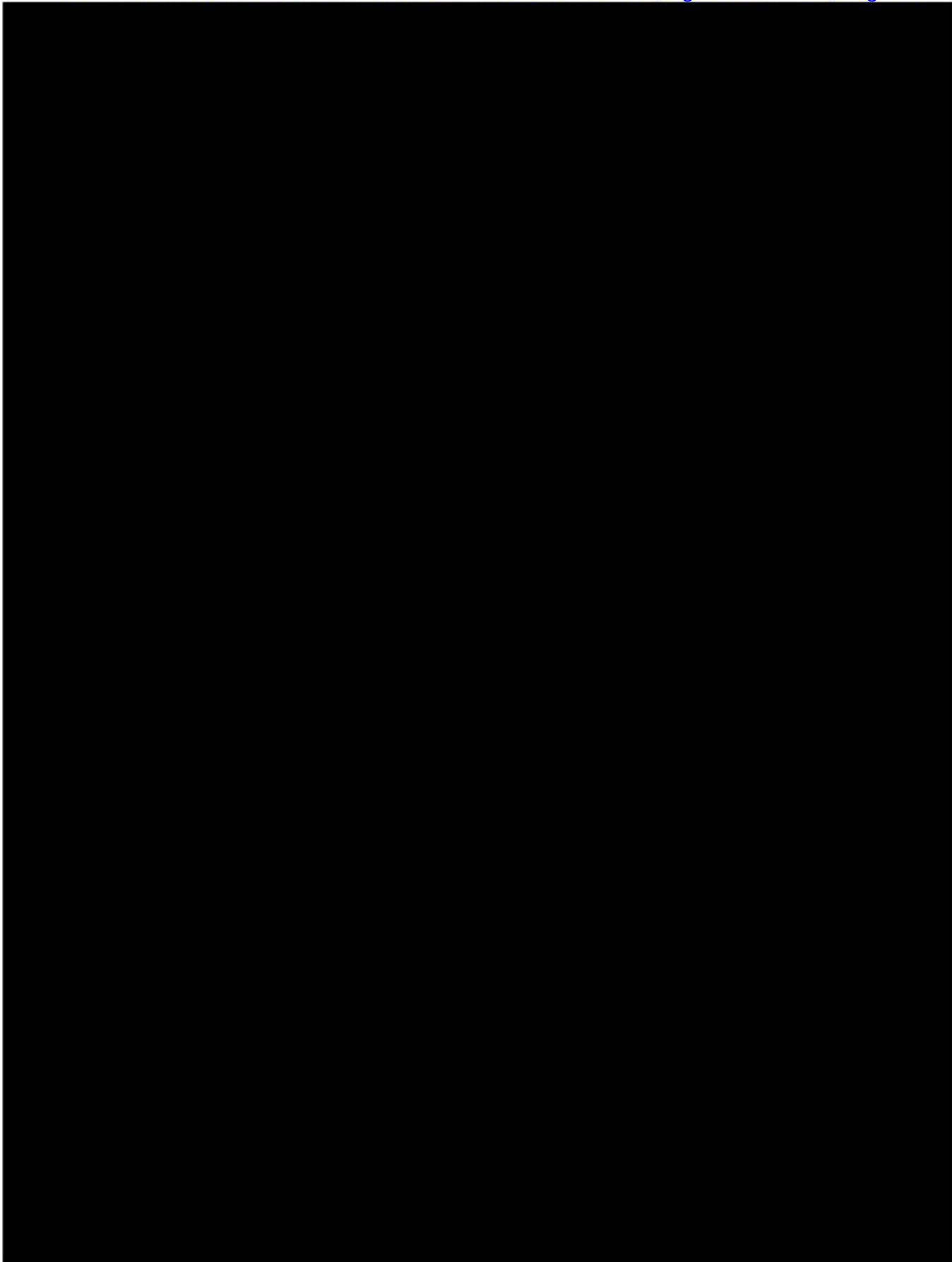


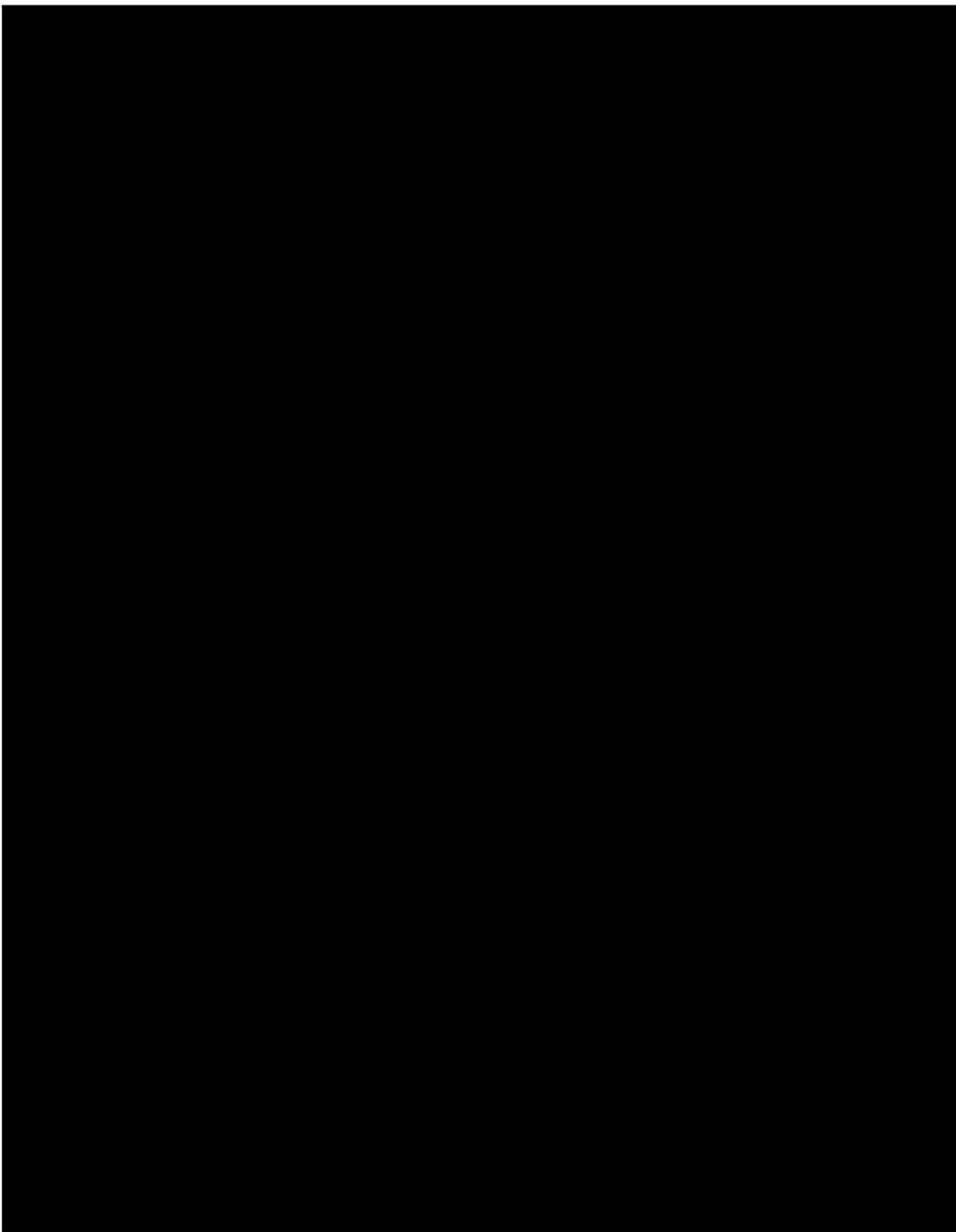


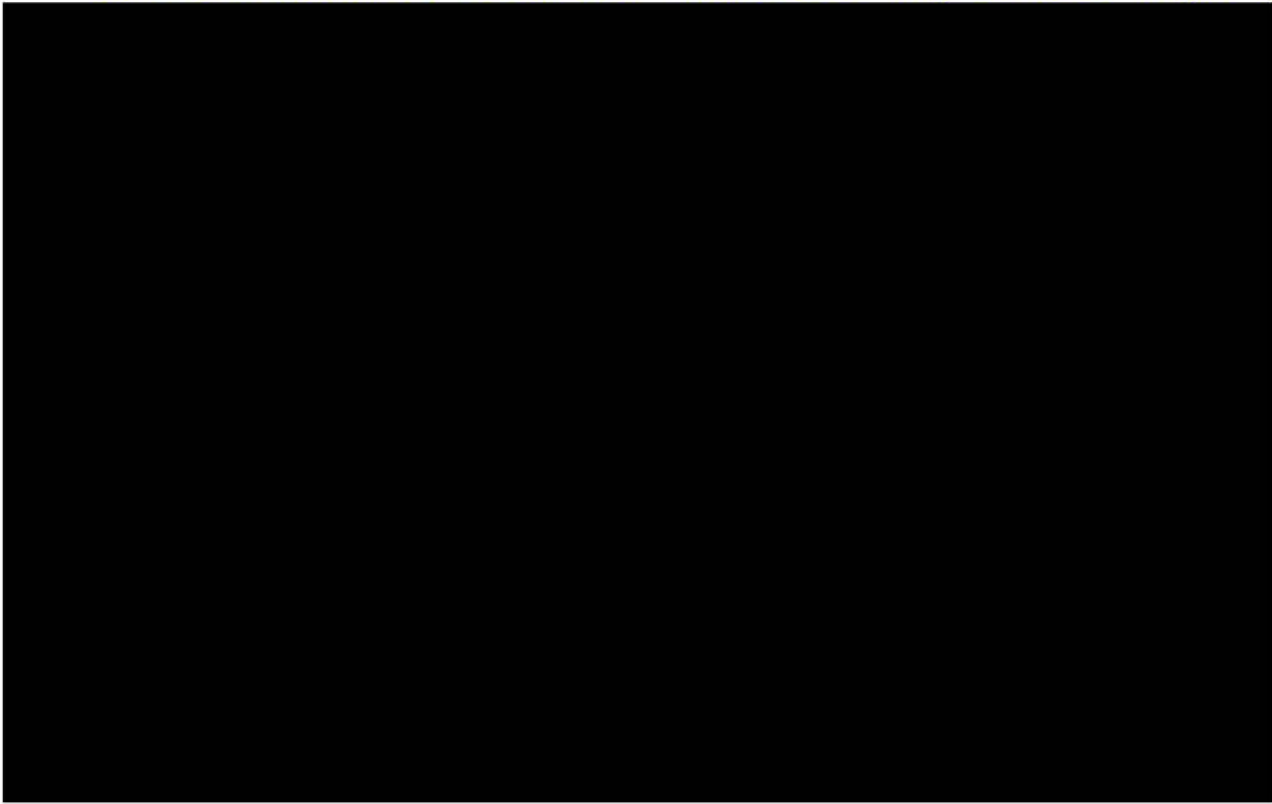


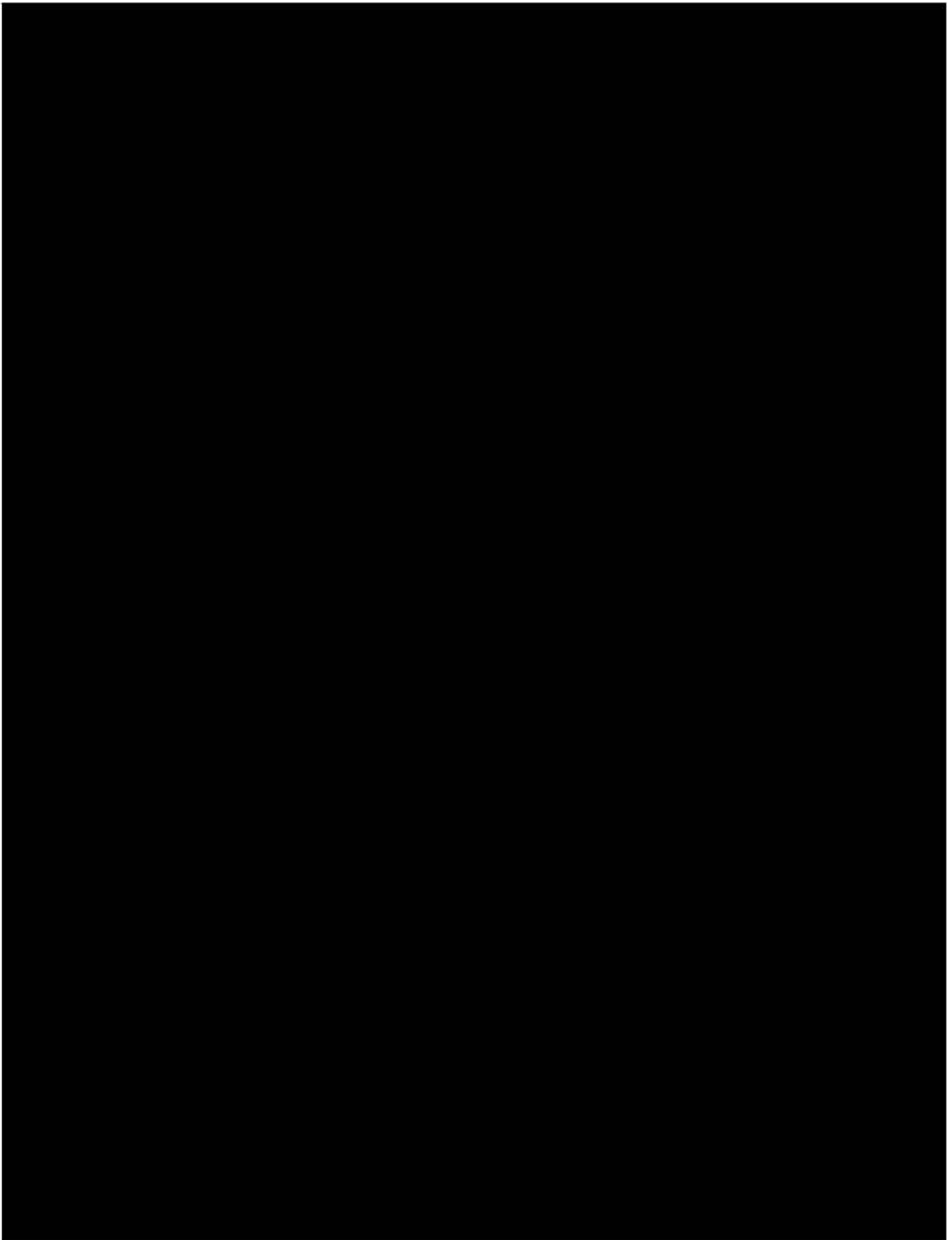


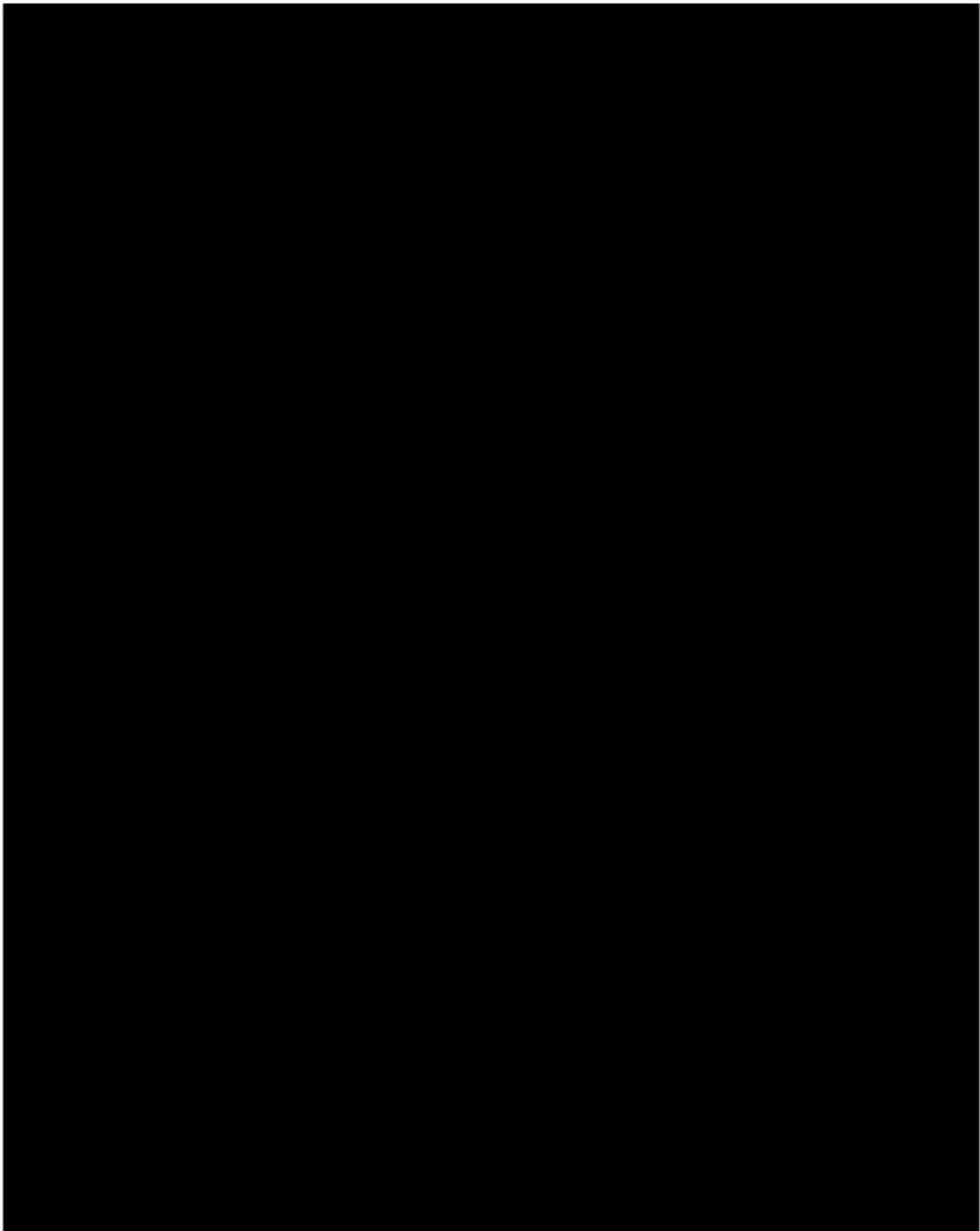


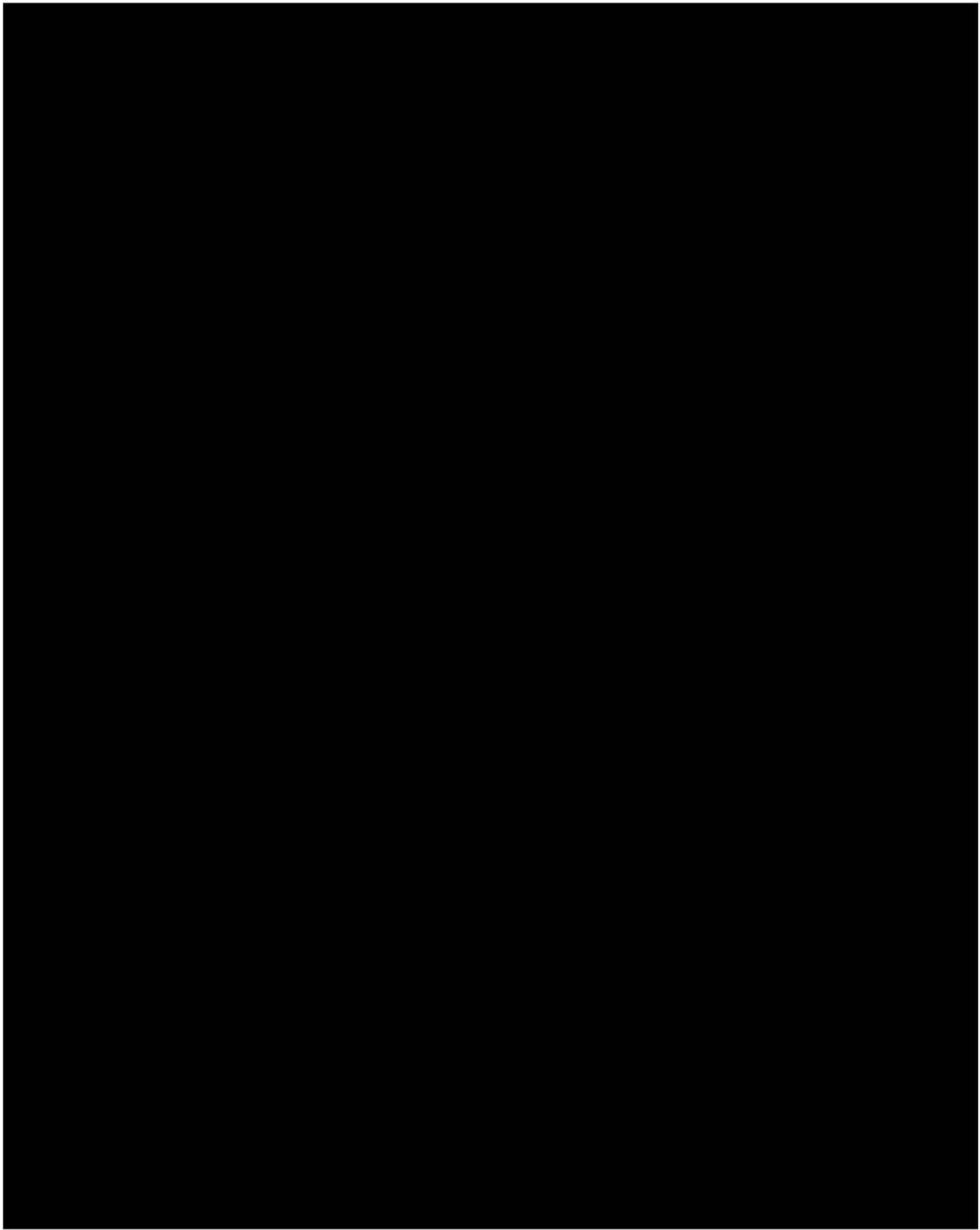


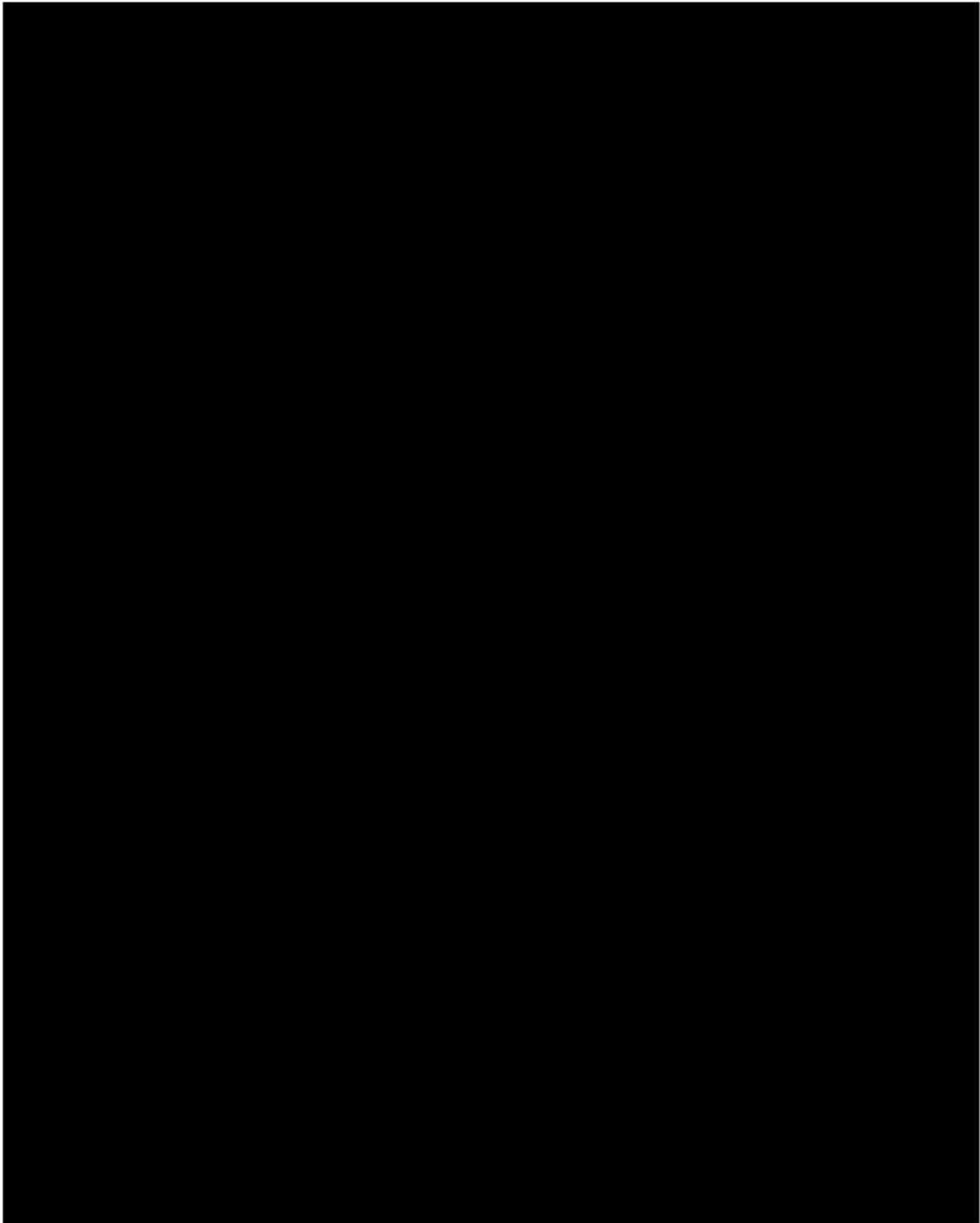














AUTHORIZATION TO DISCLOSE PROTECTED HEALTH INFORMATION

Developed for Texas Health & Safety Code § 181.154(d)
effective January 1, 2013

Please read this entire form before signing and complete all the sections that apply to your decisions relating to the disclosure of protected health information. Covered entities as that term is defined by HIPAA and Texas Health & Safety Code § 181.001 must obtain a signed authorization from the individual or the individual's legally authorized representative to electronically disclose that individual's protected health information. Authorization is not required for disclosures related to treatment, payment, health care operations, performing an insurance or health maintenance organization function, or as may be otherwise authorized by law. Covered entities may use this form or any other form that complies with HIPAA, the Texas Medical Privacy Act, and other applicable laws. Individuals cannot be denied treatment based on a failure to sign this authorization form, and a refusal to sign this form will not affect the payment, enrollment, or eligibility of benefits.

NAME OF PATIENT OR INDIVIDUAL

[REDACTED]

I AUTHORIZE THE FOLLOWING TO DISCLOSE THE INDIVIDUAL'S PROTECTED HEALTH INFORMATION:

Person/Organization Name _____
Address _____
City _____ State _____ Zip Code _____
Phone (____) _____ Fax (____) _____

WHO CAN RECEIVE AND USE THE HEALTH INFORMATION?

Person/Organization Name _____
Address _____
City _____ State _____ Zip Code _____
Phone (____) _____ Fax (____) _____

REASON FOR DISCLOSURE (Choose only one option below)

- ☐ Treatment/Continuing Medical Care
☐ Personal Use
☐ Billing or Claims
☐ Insurance
☐ Legal Purposes
☐ Disability Determination
☐ School
☐ Employment
☐ Other _____

WHAT INFORMATION CAN BE DISCLOSED? Complete the following by indicating those items that you want disclosed. The signature of a minor patient is required for these release of some of these items. If all health information is to be released, then check only the first box.

- | | | | |
|---|--|---|---|
| <input type="checkbox"/> All health information | <input type="checkbox"/> History/Physical Exam | <input type="checkbox"/> Past/Present Medications | <input type="checkbox"/> Lab Results |
| <input type="checkbox"/> Physician's Orders | <input type="checkbox"/> Patient Allergies | <input type="checkbox"/> Operation Reports | <input type="checkbox"/> Consultation Reports |
| <input type="checkbox"/> Progress Notes | <input type="checkbox"/> Discharge Summary | <input type="checkbox"/> Diagnostic Test Reports | <input type="checkbox"/> EKG/Cardiology Reports |
| <input type="checkbox"/> Pathology Reports | <input type="checkbox"/> Billing Information | <input type="checkbox"/> Radiology Reports & Images | <input type="checkbox"/> Other _____ |

Your initials are required to release the following information:

____ Mental Health Records (excluding psychotherapy notes) _____ Genetic Information (including Genetic Test Results)
____ Drug, Alcohol, or Substance Abuse Records _____ HIV/AIDS Test Results/Treatment

EFFECTIVE TIME PERIOD. This authorization is valid until the earlier of the occurrence of the death of the individual; the individual reaching the age of majority; or permission is withdrawn; or the following specific date (optional): Month _____ Day _____ Year _____.

RIGHT TO REVOKE. I understand that I can withdraw my permission at any time by giving written notice stating my intent to revoke this authorization to the person or organization named under "WHO CAN RECEIVE AND USE THE HEALTH INFORMATION." I understand that prior actions taken in reliance on this authorization by entities that had permission to access my health information will not be affected.

SIGNATURE AUTHORIZATION. I have read this form and agree to the uses and disclosures of the information as described. I understand that refusal to sign this form does not stop disclosure of health information that has occurred prior to revocation or that is otherwise permitted by law without my specific authorization or permission, including disclosures to other covered entities as provided by Texas Health & Safety Code § 181.154(c) and/or 45 C.F.R. § 164.506(a)(1). I understand that information disclosed pursuant to this authorization may be subject to re-disclosure by the recipient and may no longer be protected by federal or state privacy laws.

[REDACTED]

05/10/2021

Signature of Individual or Individual's Legally Authorized Representative

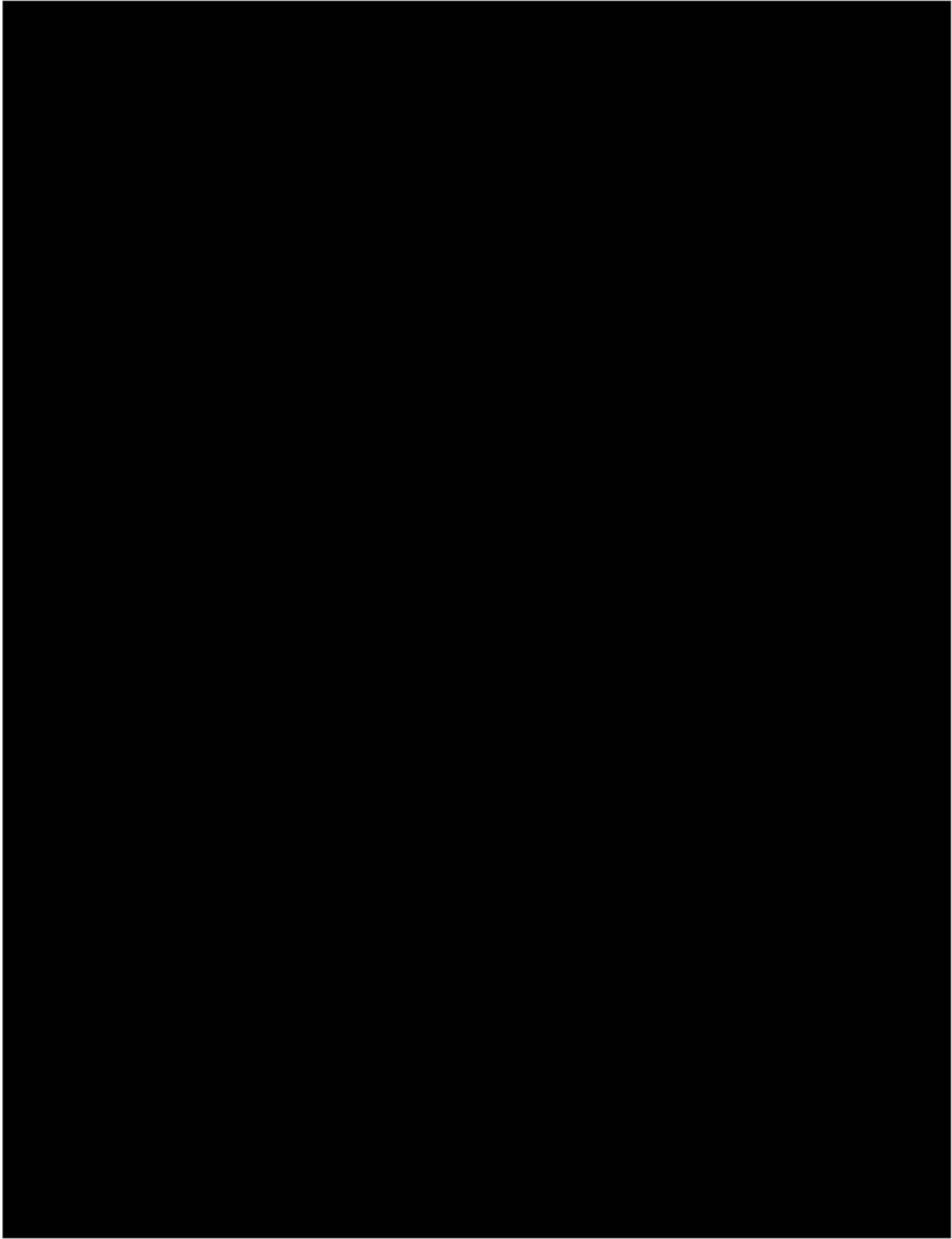
DATE

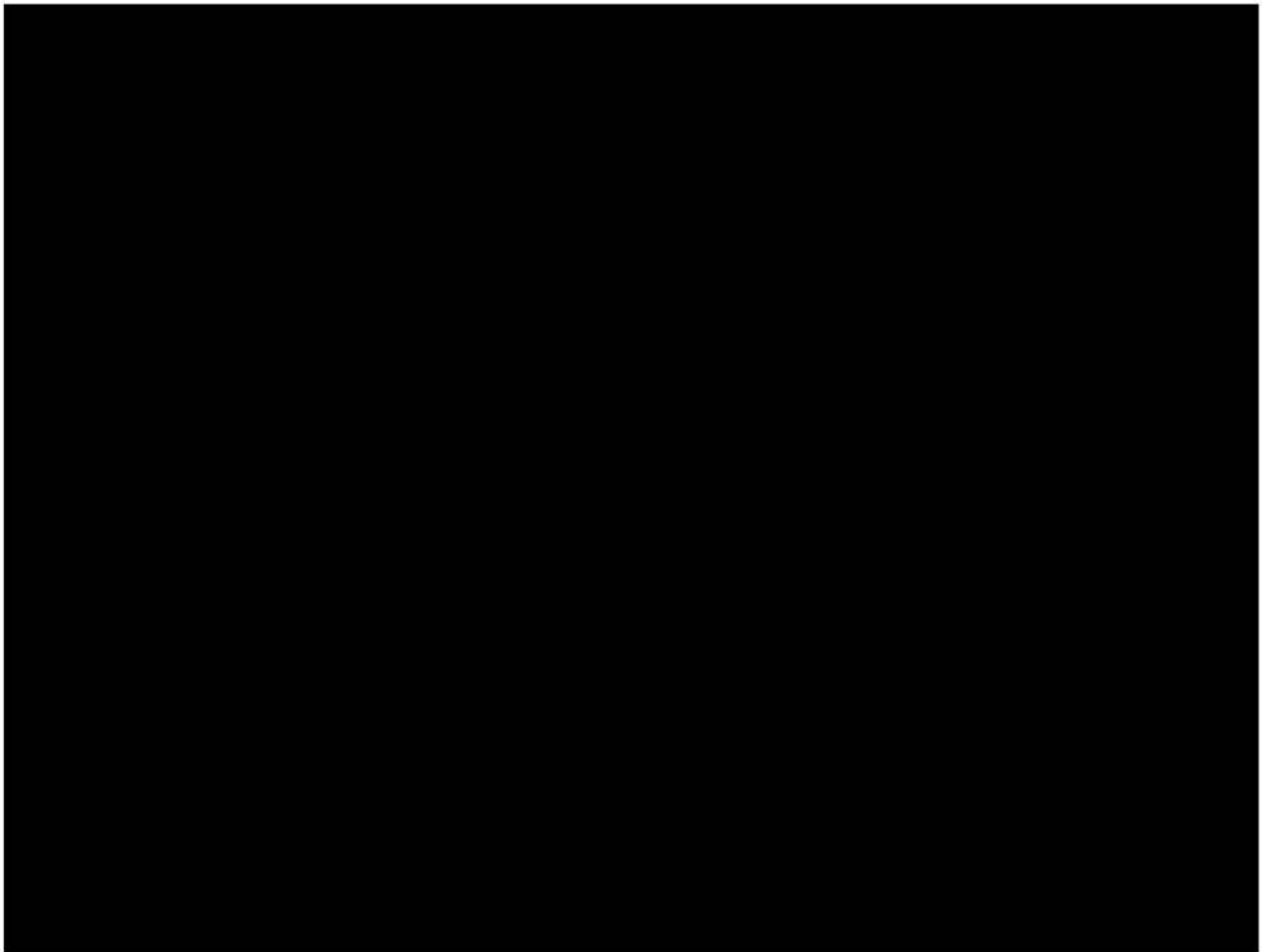
Printed Name of Legally Authorized Representative (if applicable): _____
If representative, specify relationship to the individual: ☐ Parent of minor ☐ Guardian ☐ Other _____

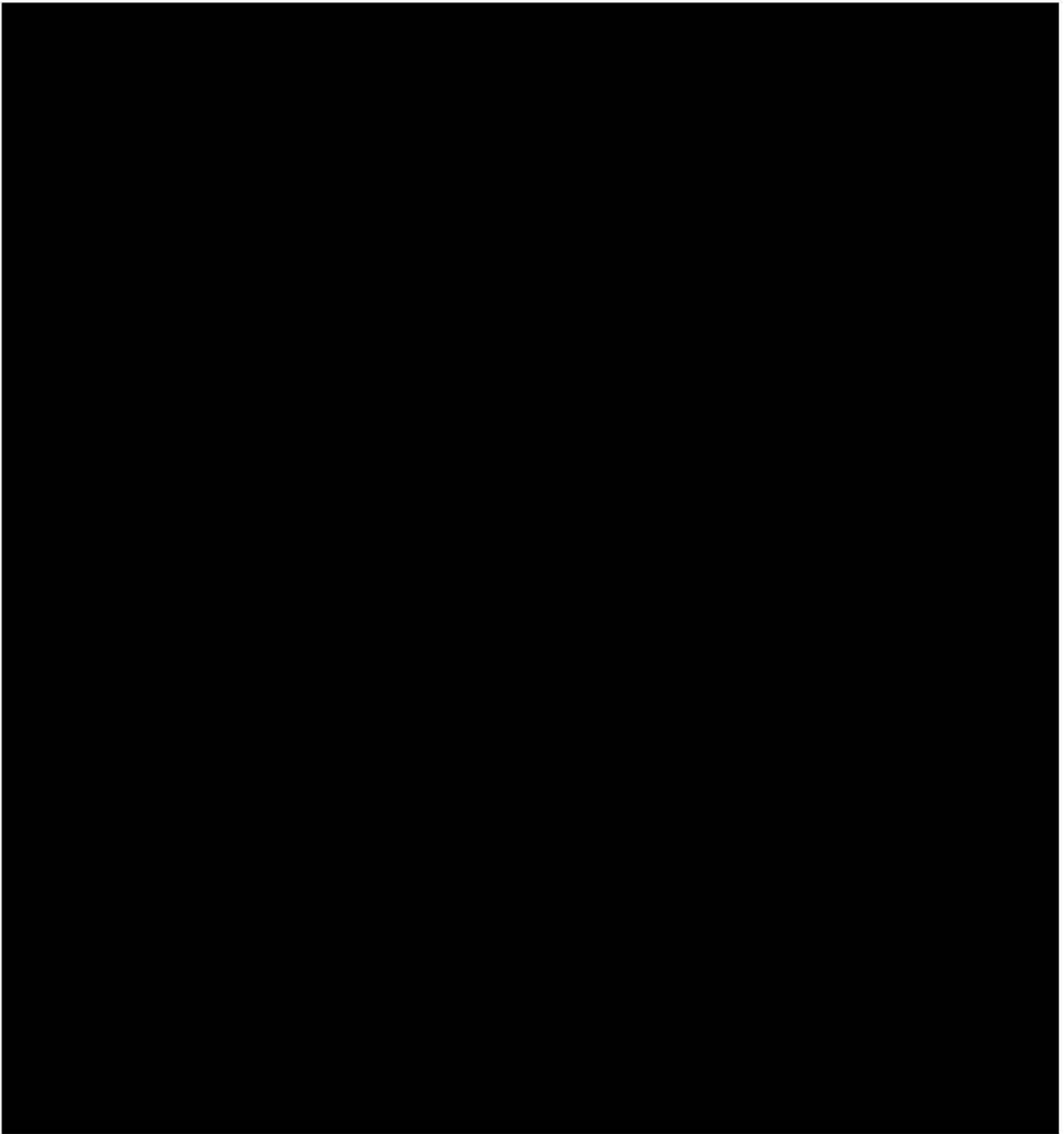
A minor individual's signature is required for the release of certain types of information, including for example, the release of information related to certain types of reproductive care, sexually transmitted diseases, and drug, alcohol or substance abuse, and mental health treatment (See, e.g., Tex. Fam Code § 32.003).

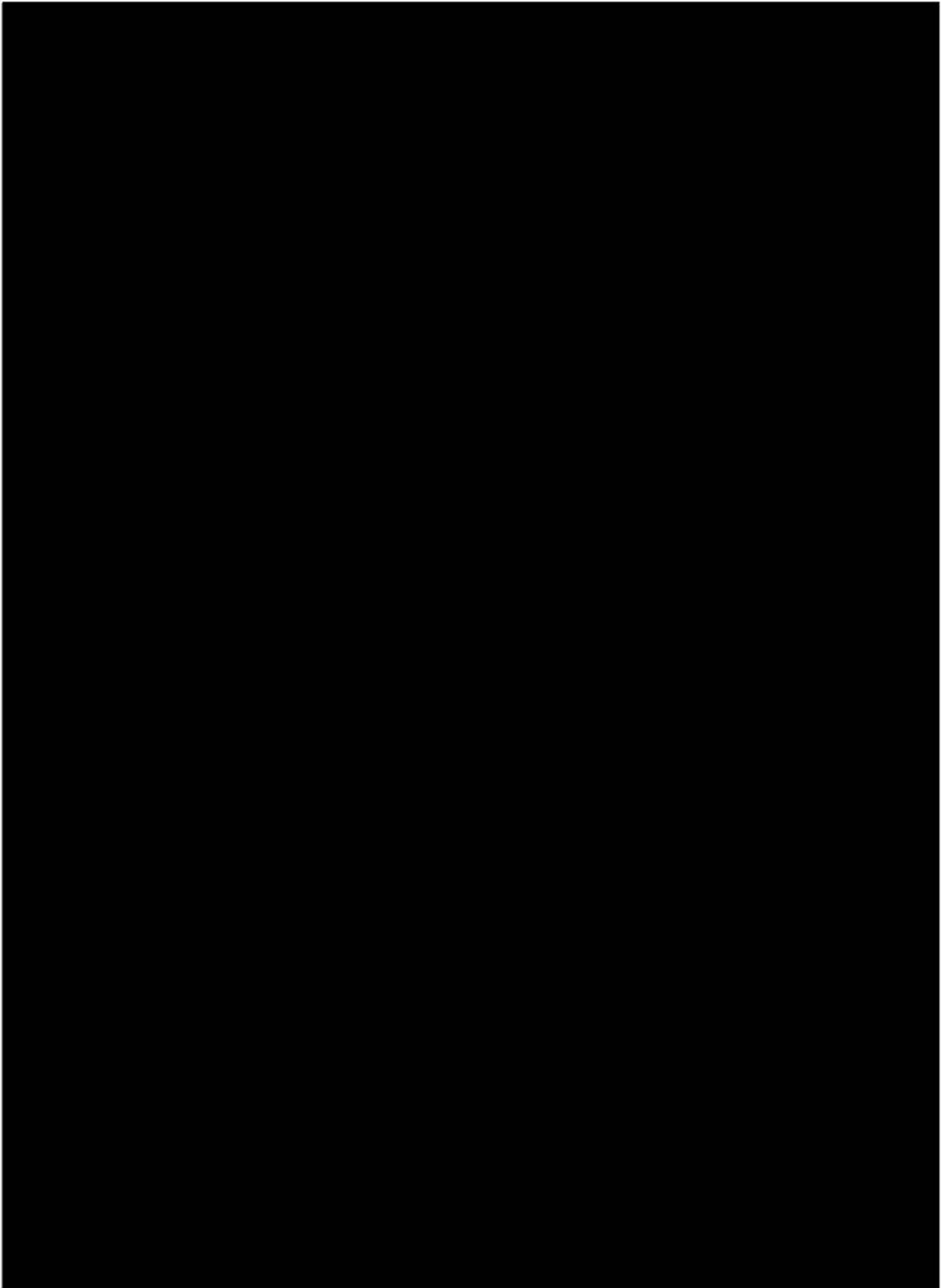
Signature of Minor Individual

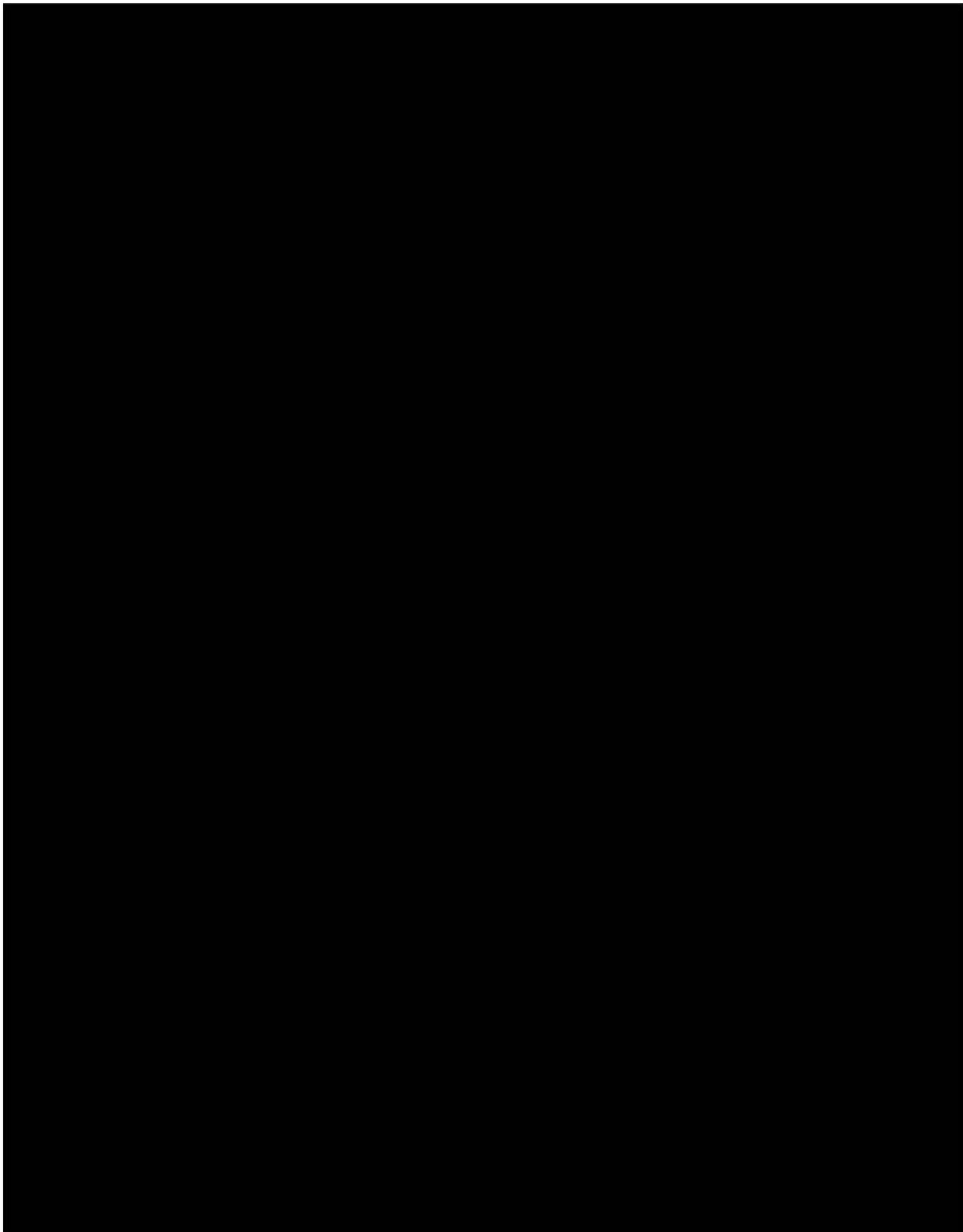
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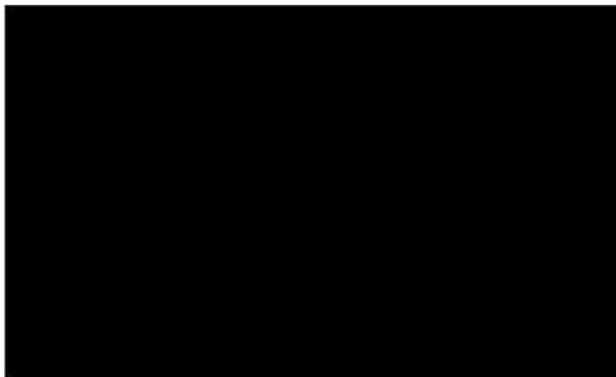


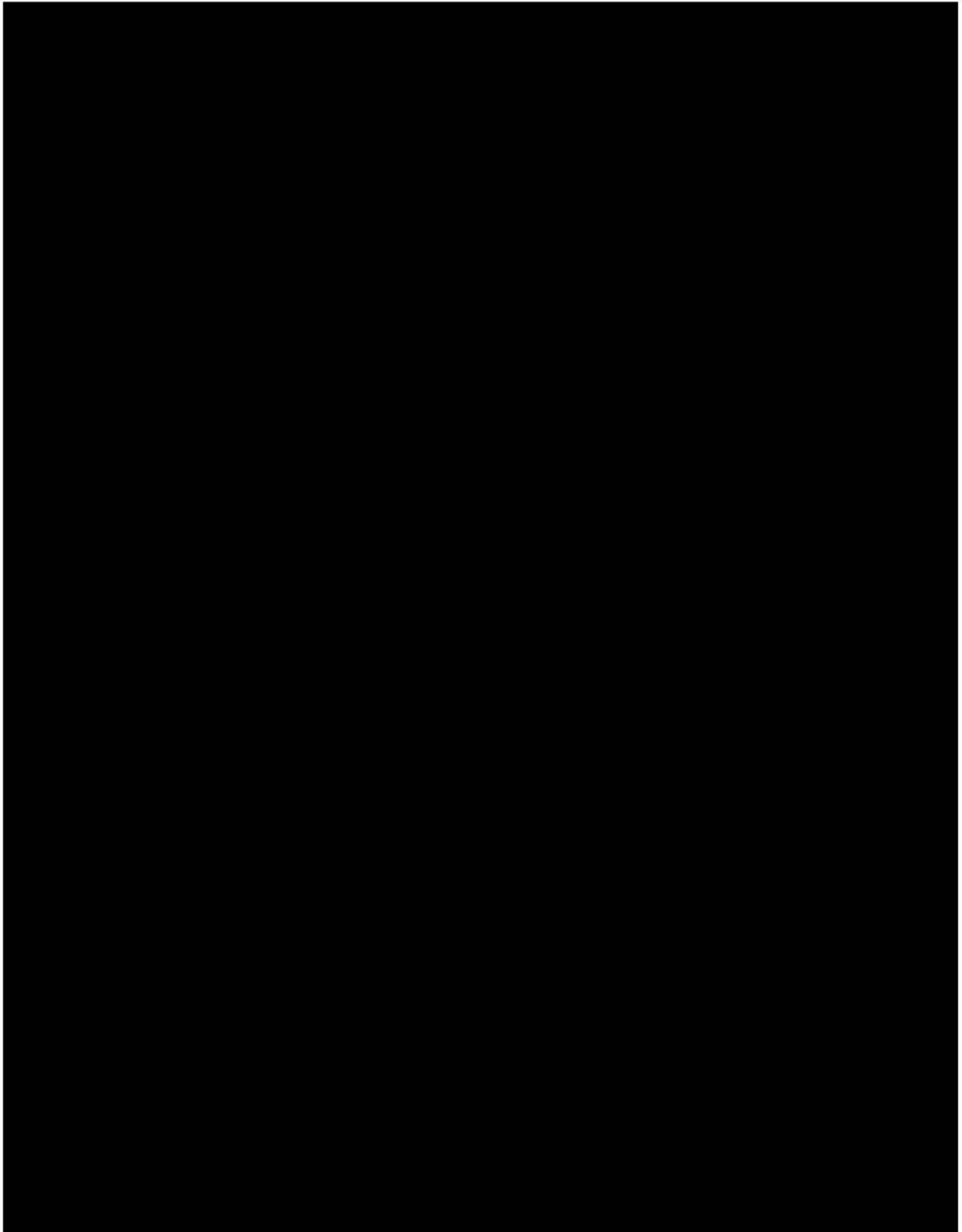


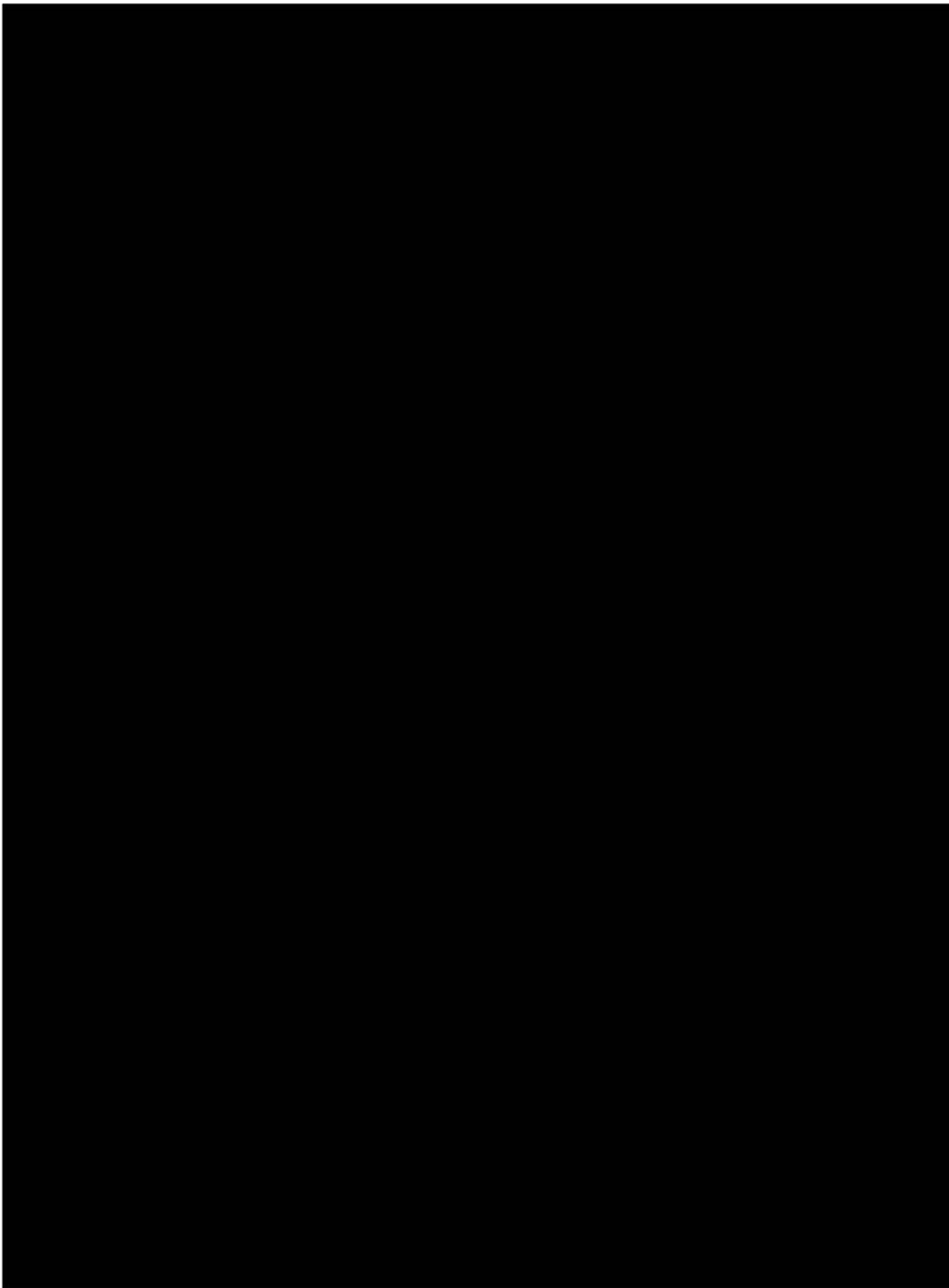












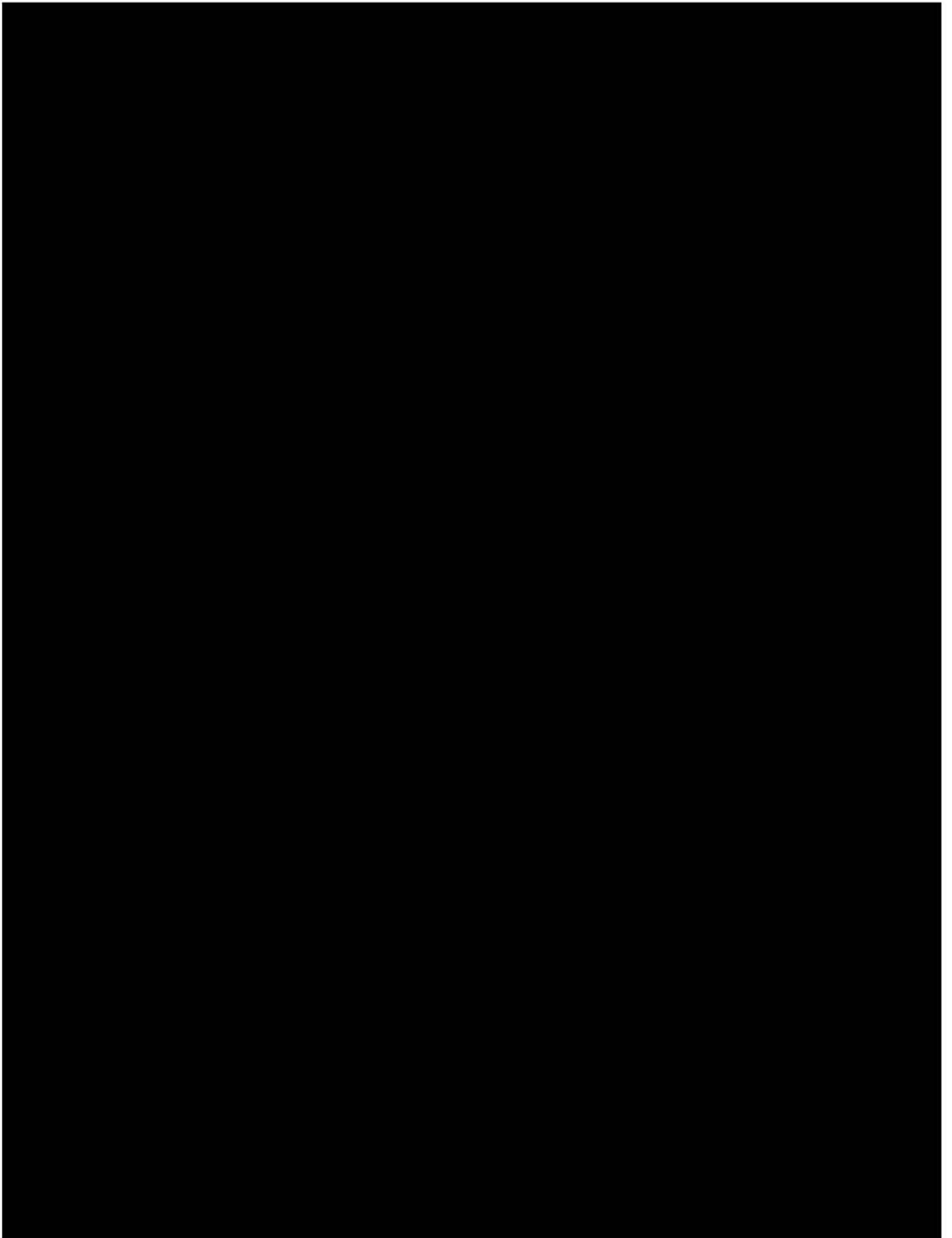


EXHIBIT 21

(To the Declaration of Diana Rausa)

FILED UNDER SEAL

EXHIBIT 21

(To the Declaration of Diana Rausa)

FILED UNDER SEAL

See Native Excel file marked QUINTESSA_000001

CONFIDENTIAL-ATTORNEYS' EYES ONLY

FILED MANUALLY WITH THE COURT



intaketime	casestatus	casedescription	pname	pcity	pcstate	accidentstate
8/25/22 5:42 PM	Denied	DENIED: existing case pc is only calling in to let jim adler firm she changed address not needing second opinion DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TX	TX
8/22/22 10:56 AM	Denied	DENIED no accident very adamant on Jim Adler DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TX	TX
8/19/22 11:46 AM	Denied	Calling for Jim Adler, not happy with rep Hit and run accident DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	x x	N/A	TX	TX
7/28/22 12:45 PM	Denied	DENIED: existing case w jim adler MVA happened in 08/2021 satisfied with rep not needing second opinion DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TX	TX
7/14/22 12:45 PM	Denied	denied- existing case/ happy with services looking for update/ jim adler/ no 2nd opinion DOI: a month ago Injuries: Liability: hit and run, looking for DEF Vehicle and Insurance: PC- DEF- Passengers: Commercial:		N/A	TX	TX
7/11/22 10:42 AM	Denied	Denied- no 2nd opinion wants a 2nd opinion cb at 2pm existing case mva not happy with services- its taking forever in the settlement process Jim Adler DOI: March 26th, 2021 Injuries: The PC Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial: +12142326255		N/A	TX	TX
7/8/22 10:01 AM	Denied	follow up tomorrow, jim adler denied her case and she wants her sister involved in the conversation since she was in the accident too DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TX	TX
7/5/22 8:30 AM	Denied	denied 2nd opinion. scb 7/5 at 1 to see if she is happy w/ atty DOI: 12/23/2020 TX Injuries: shoulder neck and back PC went to PT 7 weeks and is represented by Jim Adler, cant get response, hasnt spoken with them in 6 months. Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:		N/A	TX	TX

CONFIDENTIAL

QUINTESSA_002596

Appx. 367

6/23/22 4:08 AM	Denied	PC IS ROC Wjim adler I was at a red light and got hit from the back a 50 miles per hour Are you currently represented: Were you at fault: No Were you injured: YES Did you seek medical treatment: YES	[REDACTED]	N/A	TX	TX
6/22/22 2:30 PM	Potential	Potential - calling for Jim Adler and did not want me to ask him questions. Gave him mine phone number in case he want s a second opp DOI: Injuries: Liability: The PC was a passenger and the driver has a case with Jim Adler Vehicle and Insurance: PC- DEF- Passengers: Commercial:	[REDACTED]	N/A	TX	TX
6/21/22 2:26 PM	Denied	DENIED: existing case with jim adler did not want a second opinion just needed a case update SPANISH DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TX	TX
6/3/22 10:58 AM	Denied	existing case/ mva / needing an update/ wants to know about settlement / jim adler DOI: a year ago Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	[REDACTED]	N/A	TX	TX
6/1/22 7:43 PM	Esigned	DOI: 05/06/2022 Austin TX Injuries: Back pain and arm numbness. The PC is willing to get checked out. The PC was out for a week from work. Liability: The PC was at a stop light when the Def rear ended the PC. The PC slide across the intersection. The police did not come to scene Vehicle and Insurance: PC- 1988 Toyota truck Kemper DEF- Dodge shadow United Auto Passengers: 0 Commercial: no	[REDACTED]	TX	TX	TX
5/16/22 11:44 AM	Denied	Denied- calling for jim adler / traffic ticket DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial: 18178620144	Unknown Caller	N/A	TX	TX
5/10/22 2:20 PM	Denied	denied- existing case/ mva/ happy with services, received a letter in march about a demand letter to insurance for settlement/ jim adler/ no free consult DOI: Jan 2022 Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	[REDACTED]	N/A	TX	TX

CONFIDENTIAL

QUINTESSA_002597
Appx. 368

5/4/22 3:17 PM	Denied	PC is happy with attorney, denied- existing case/ MVA/ not happy with atty due to communication/ Jim ADLER DOI: April 15th 2021 Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial: +18323424409	[REDACTED]	N/A	TX	TX
4/7/22 12:19 PM	Denied	existing case/ has a question/ Jim Adler/ happy with services DOI: March 21st, 2022 Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	[REDACTED]	N/A	TX	TX
4/4/22 12:50 PM	Denied	Missed Qm Injury. Existing case with Jim Adler. Denied second opinion. DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TX	TX
3/25/22 3:34 PM	Denied	denied- existing case/ mva/ needing update from case manger/ happy with services/ Jim adler DOI: Oct 2021 Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	[REDACTED]	N/A	TX	TX
3/7/22 1:32 PM	Denied	Existing case with Jim Adler/Happy with rep. Denied. DOI: Injuries: Liability: Vehicle and Insurance: PC- DEF- Passengers: Commercial:	Unknown Caller	N/A	TN	TN

CONFIDENTIAL

QUINTESSA_002598
Appx. 369

EXHIBIT 22

(To the Declaration of Diana Rausa)

FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIM S. ADLER, P.C. and JIM ADLER,

Plaintiffs,

v.

CIVIL ACTION NO. 3:19-cv-02025-K-BN

MCNEIL CONSULTANTS, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
QUINTESSA MARKETING, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
and LAUREN VON MCNEIL,

Defendants.

DECLARATION OF [REDACTED]

I, [REDACTED] make the following declaration:

1. I am an individual residing in Dallas, Texas with an address of [REDACTED]
[REDACTED]

2. I make this declaration based on my own personal knowledge of the facts stated in this declaration. I could and would competently testify as to the matters set forth below if called upon to do so.

3. On June 20, 2020, I was in a motor vehicle accident that occurred at or around Dallas, Texas. At the time of the accident, I was seventeen years old.

4. On June 21, 2020, my mother, [REDACTED] engaged attorney Jim Adler on my behalf to provide legal representation for me in connection with my claims arising from the accident.

5. Thereafter, I attempted to contact Mr. Adler to check on the status of my case. To do so, I conducted a Google search on my mobile phone for "Jim Adler" to locate his phone number.

6. After conducting the search, I clicked on one of the first results believing it was the phone number for Mr. Adler. Clicking on the search result automatically connected me by telephone with a person I believed was Mr. Adler's representative.

7. The person who answered my call requested information about my case, and I complied with the request believing it was necessary so that the person could check the status of my case. The person never identified themselves as not associated with Mr. Adler.

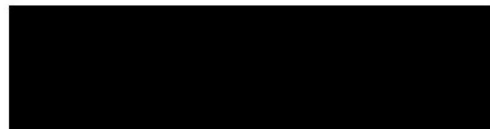
8. After that call, I received several additional calls from persons who identified themselves as my "case manager" and who I believed were Mr. Adler's representatives.

9. During one of these subsequent calls, the caller sent me a document to sign, which I understood to be related to my representation by Mr. Adler. I signed the document using my mobile phone as instructed. A true and correct copy of the document is attached to this declaration as **Exhibit A.**

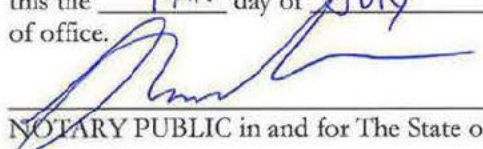
10. Sometime after receiving those additional calls and signing the document as requested, I learned that the person I initially called through my Google search and the persons who subsequently called me back were not Mr. Adler's representatives or otherwise associated with Mr. Adler.

11. I declare under penalty of perjury that the foregoing is true and correct.

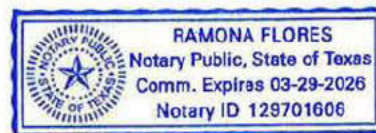
Executed in Dallas, Texas on July 14, 2022.



SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public, on this the 14th day of July, 2022, to certify which witness my hand and seal of office.


NOTARY PUBLIC in and for The State of Texas

My Commission expires: March 29, 2024



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIM S. ADLER, P.C. and JIM ADLER,

Plaintiffs,

v.

MCNEIL CONSULTANTS, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
QUINTESSA MARKETING, LLC D/B/A
ACCIDENT INJURY LEGAL CENTER,
and LAUREN VON MCNEIL,

Defendants.

CIVIL ACTION NO. 3:19-cv-02025-K-BN

DECLARATION OF JACKSON WARREN

I, Jackson Warren, make the following declaration:

1. I make this declaration based on my own personal knowledge of the facts stated herein.

I could and would competently testify as to the matters set forth below if called upon to do so.

2. I am an attorney employed by Plaintiffs with a business address of 2711 North Haskell Avenue, Suite 2500, Dallas, TX 75204. I have worked as a personal injury attorney for eighteen (18) years. I have been employed by Plaintiffs as a personal injury attorney for 5 years and 6 months.

3. In the course of my employment with Plaintiffs, I was assigned to handle the case of [REDACTED] whose mother, [REDACTED] engaged Plaintiffs to represent [REDACTED] in connection with a motor vehicle accident that occurred on June 20, 2020.

4. I understand that [REDACTED] engaged Plaintiffs on [REDACTED] behalf because, at the time, [REDACTED] was only seventeen years old and a legal minor. [REDACTED] signed an agreement engaging Plaintiffs on behalf of [REDACTED] on June 21, 2020. A true and correct copy of the engagement agreement is attached to this declaration as **Exhibit A**.

5. Thereafter, I learned from a GEICO adjuster that [REDACTED] had placed a lien against any recovery by [REDACTED] for his claims arising from the June 20, 2020 accident, asserting that it is entitled to a share of the recovery on the basis that the [REDACTED] was [REDACTED] prior counsel in connection with the accident.

6. [REDACTED]—a non-party in the underlying lawsuit between Plaintiffs and Defendants—claimed to have previously represented [REDACTED] in connection with his personal injury claims arising from the June 20, 2020 accident. I also received a document purporting to be an engagement agreement between [REDACTED] and the [REDACTED] that was allegedly signed by [REDACTED] on August 11, 2020.

7. I have attempted to contact the [REDACTED] on multiple occasions to request that it release the lien on [REDACTED] recovery given that he was a legal minor as of August 11, 2020 and unable to enter a binding agreement.

8. To date, the [REDACTED] has sought to maintain its lien on [REDACTED] recovery. The lien has delayed final resolution of [REDACTED] case by at least six months, and that delay remains ongoing since the [REDACTED] has yet to release its lien.

9. But for the [REDACTED] lien, [REDACTED] would have already received payment on his portion of the recovery from the June 2020 accident.

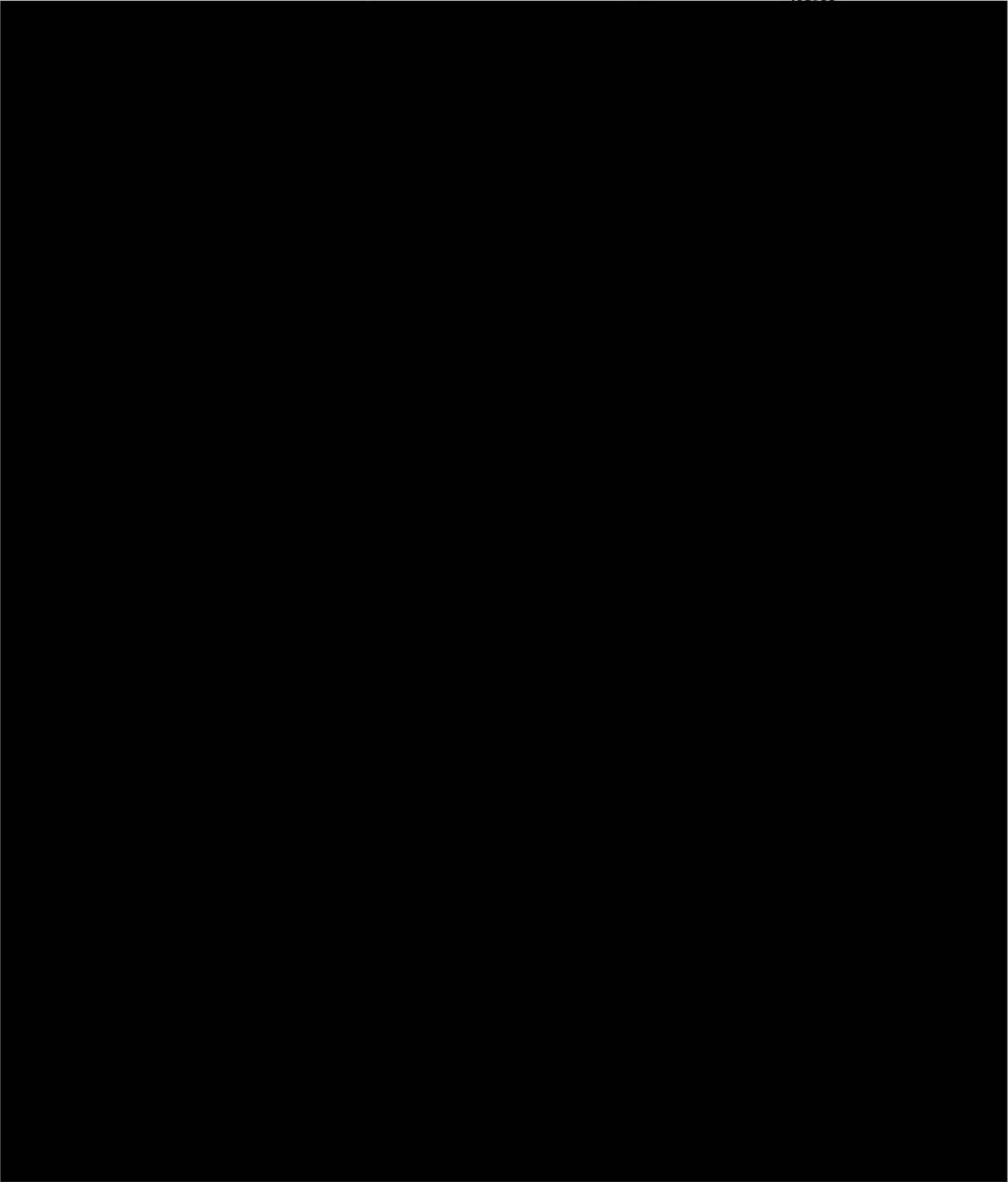
10. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas, Texas on July 20, 2022.

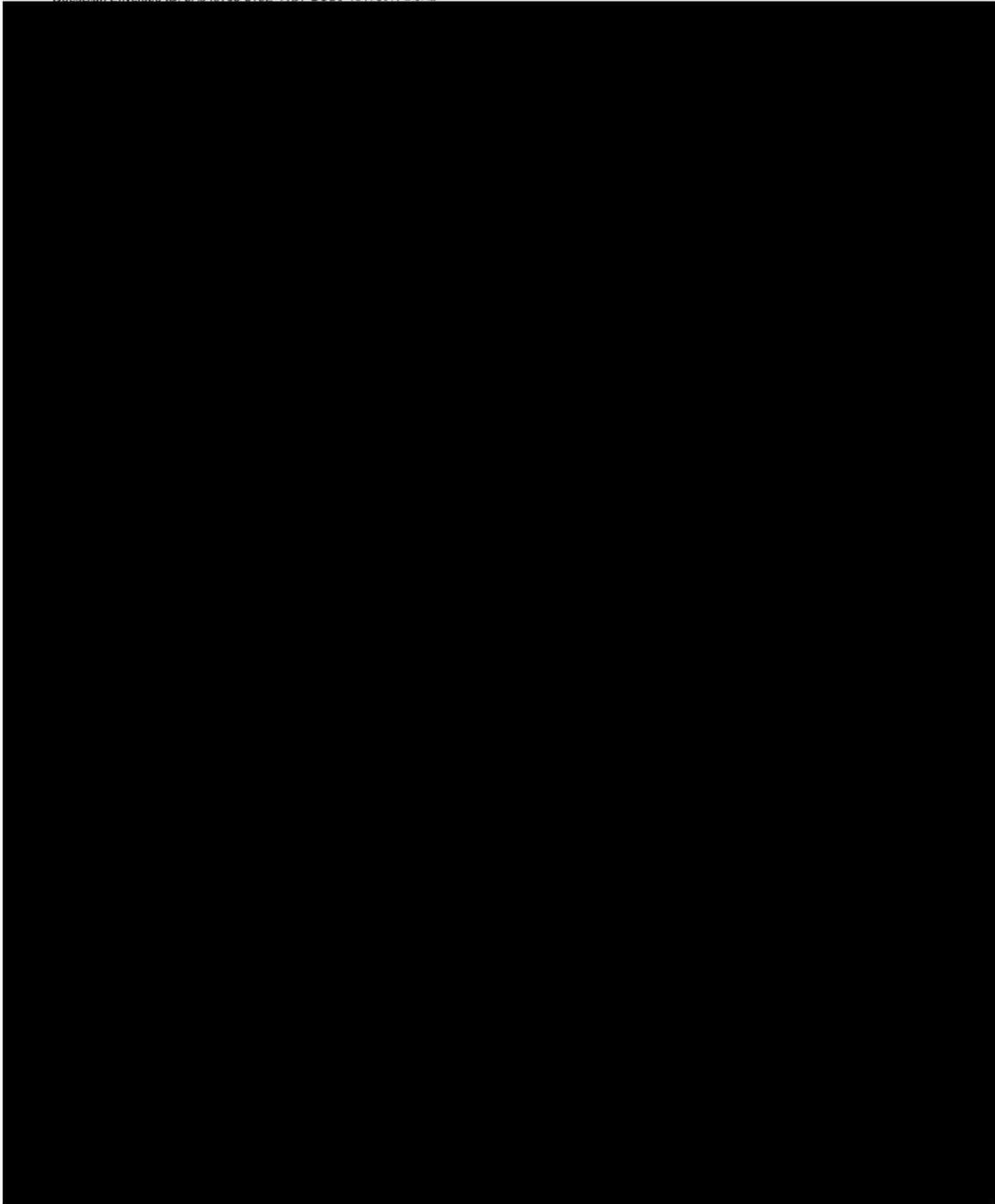

Jackson Warren

EXHIBIT A

DocuSign Envelope ID: 5A340788-616E-41D7-BCC5-1017397FCA2



DocuSign Envelope ID: 5A340788-616F-41D7-BCC5-1017397FDCA2



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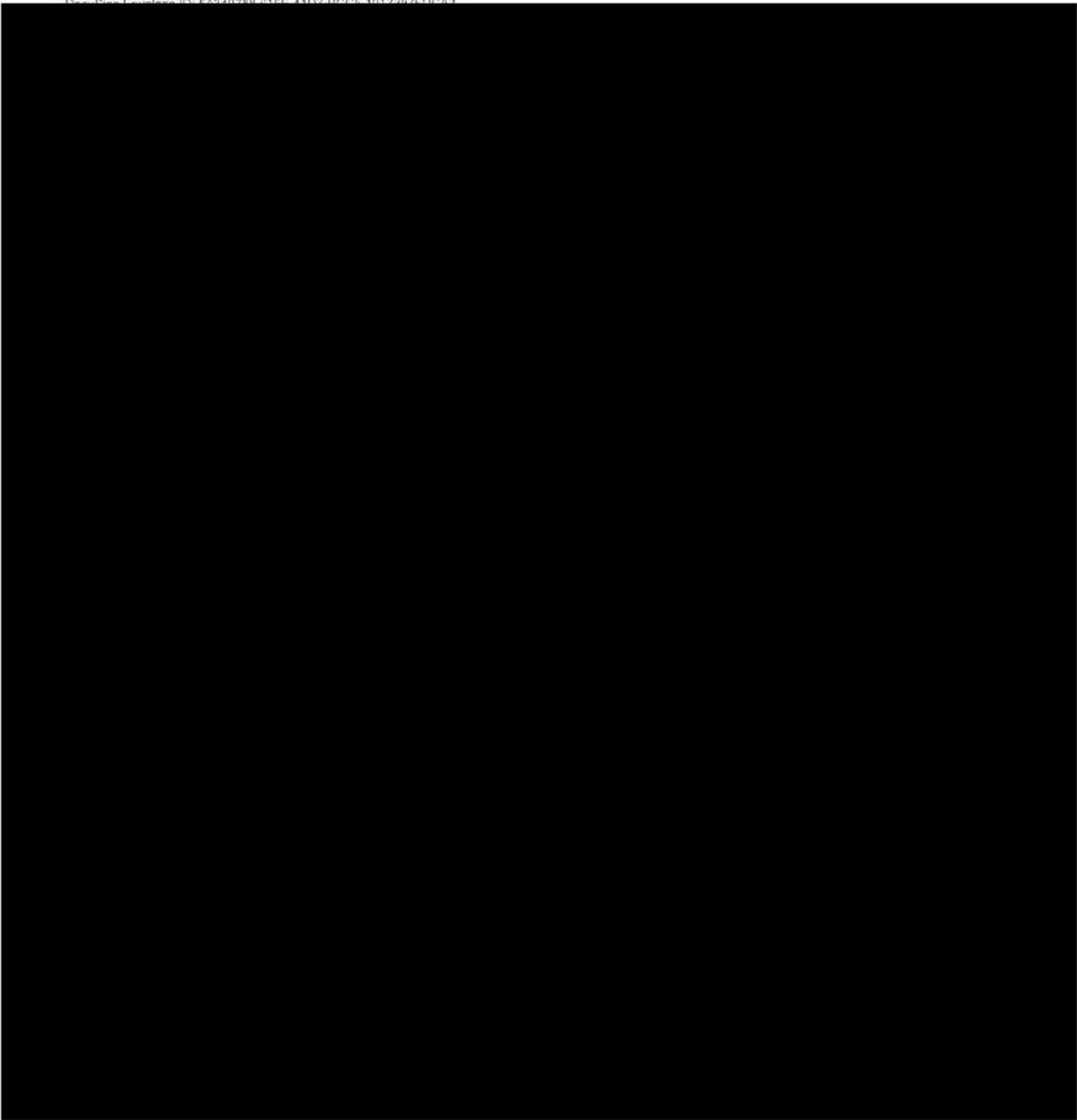


EXHIBIT 23

(To the Declaration of Diana Rausa)

FILED UNDER SEAL

From: Lauren McNeil
Sent: Wednesday, June 13, 2018 2:10 PM CDT
To: [REDACTED]
CC: accidentintakeforms2@gmail.com; intake@quintessamarketing.com; intakeuser@quintessamarketing.com;
Subject: Re: [REDACTED] MOTOR VEHICLE ACCIDENT ESIGNED TX

We checked with him he signed with Adler two days after because he wasn't contacted

Lauren V. McNeil
Founder & CEO
[Quintessa Marketing](#)

M: [405-443-9756](#)

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On Jun 13, 2018, at 2:01 PM, [REDACTED] wrote:

Disengaged. This one is bizarre. Y'all e-signed him for us, but then when we spoke with him he said that he already signed with Jim Adler. He is already represented.



From: <accidentintakeforms2@gmail.com>
Date: Wednesday, June 6, 2018 at 12:49 PM
To: <intake@quintessamarketing.com>, <intakeuser@quintessamarketing.com>, <lauren@quintessamarketing.com>, [REDACTED]
Subject: [REDACTED] MOTOR VEHICLE ACCIDENT ESIGNED TX

PC is aware that you all will.

Intake Date/Time: 06/06/2018 12:21 PM

Case Summary: DOI: 06/06/2018

Injury: The PC has neck, and back injuries. PC stated he will be following later today at the ER regarding his injuries.

Liability: The PC stated the DEF (US Postal Office mailman) was coming N bound from the opposite direction and turned out left in front of the PC cutting him off, hitting the front passenger side of the PC's vehicle. The police came to the scene and cited the DEF at fault for the accident. The PC will go to the doctor later today.

Insurance: Will provide later

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PC Emergency Contact Name: decline to provide

PC Emergency Contact Phone: decline to provide

Incident Date: 06/06/2018

Incident Location: Childress and Wichita

PC Insurance Company: none

PC Ins. Claim #: x

Private Health Insurance: none

Was PC at fault?: Unknown

Was PC injured?: Yes

Is PC Currently Pursuing Treatment?: Yes

If not, is PC willing to do follow-up treatment?: Yes

PC Vehicle Info (Year/Make/Model): 1985 Chevy Camaro

Defendant Vehicle Info (Year/Make/Model): Mailman commercial vehicle

Investigating Police Dept: city police

Injuries and Treatment: The PC has neck, and back injuries. PC stated he will be following later today at the ER regarding his injuries.

Prior Attorney Name: n/a

Prior Settlement?: No

Property Damage Description: vehicle totaled. PC decline to provide prop. damage estimation.

Property Damage Amount: 1000

Defendant Name: will provide later/police report

Adverse Insurance: will provide later/police report

Adverse Ins. Claim #: x

Who was ticketed for the accident: Unknown

defendantclaimno: x

Person Ticketed Explanation: will provide later/police report

From: Lauren McNeil
Sent: Tuesday, August 6, 2019 8:56 AM CDT
To: [REDACTED]
CC: accidentintakeforms@gmail.com; intake@quintessamarketing.com [REDACTED]
Subject: Re: [REDACTED] COMMERCIAL MVA ATTORNEY SIGNED T

Not sure, but we all do the same marketing as all of the big attorneys. So we run concurrent marketing.

Let me know any others that say that and I'll look into it

Lauren V. McNeil
Founder & CEO
[Quintessa Marketing](#)

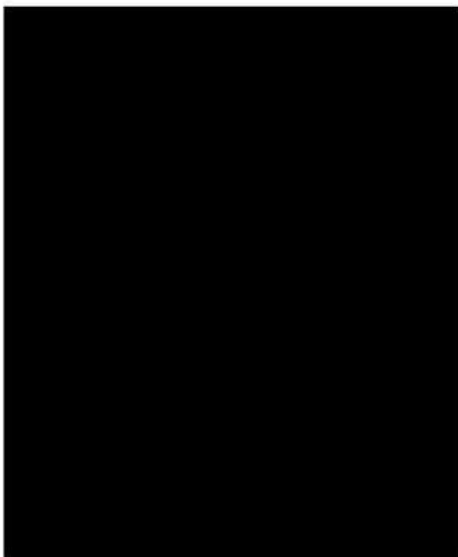
M: [405-443-9756](tel:405-443-9756)

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On Aug 6, 2019, at 8:53 AM, [REDACTED] wrote:

Maybe, but it has been an ongoing with some of these PC's and on one of them, she though she sighed up with Jim Adler until she came to meet with us in person. She is a very satisfied client, but I was just wondering why they are under that impression.



From: Lauren McNeil <lauren@quintessamarketing.com>

Sent: Tuesday, August 06, 2019 8:52 AM

To: [REDACTED]

Cc: accidentintakeformsz@gmail.com, intake@quintessamarketing.com; [REDACTED]

Subject: Re: [REDACTED] COMMERCIAL MVA ATTORNEY SIGNED TX

We will call and clarify, she said she had spoken with them previously so she may be confused.

Lauren V. McNeil

Founder & CEO

[Quintessa Marketing](http://QuintessaMarketing.com)

M: [405-443-9756](tel:405-443-9756)

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On Aug 6, 2019, at 8:47 AM, [REDACTED] wrote:

I spoke with this lady last night and she kept insisting that Jim Adler referred her to us. I have had several PC's tell me that. Why are they under the impression they are being referred by Jim Adler?



[REDACTED]

-----Original Message-----

From: accidentintakeforms2@gmail.com <accidentintakeforms2@gmail.com>

Sent: Monday, August 05, 2019 7:06 PM

To: [REDACTED] Susan Cavazos

[REDACTED]; lauren@quintessamarketing.com;

intake@quintessamarketing.com; [REDACTED]

Subject: [REDACTED] COMMERCIAL MVA ATTORNEY SIGNED TX

Sending with updated info

Intake Date/Time: 08/05/2019 06:39 PM

Case Summary: #DOI: 08/05/19 | MVA | Houston, TX

#Incident: PC was the passenger on the Metro Bus. The bus was rear-ended by the DEF at a railroad crossing. The DEF immediately fled the scene after the impact.

#Property Damage: The bus wasn't damaged very badly. The DEF's vehicle was damaged, though.

#Liability: The metro police came to the scene. However, the DEF fled the scene.

#Insurance: Open Investigation

#Injuries/Treatment: PC is currently at the ER. PC stated her neck and back are hurting.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Case Type: Commercial MVA

[REDACTED]

[REDACTED]

[REDACTED]

PC Emergency Contact Name: x

PC Emergency Contact Phone: x

Incident Date: 08/05/2019

Incident Location: Houston, TX

PC Insurance Company: Metro Bus

PC Ins. Claim #: Will Prov

Private Health Insurance: No Private Health Insurance

Was PC at fault?: No

Was PC injured?: Yes

Is PC Currently Pursuing Treatment?: Yes

If not, is PC willing to do follow-up treatment?: Yes

PC Vehicle Info (Year/Make/Model): Metro Bus

Defendant Vehicle Info (Year/Make/Model): See Police Report

Investigating Police Dept: Metro Police

Injuries and Treatment: PC stated her neck and back are hurting.

Prior Attorney Name: N/A

Prior Settlement?: No

Property Damage Description: The bus wasn't damaged very badly. The DEF's vehicle was damaged, though.

Property Damage Amount: 0

Defendant Name: See Police Report

Adverse Insurance: See Police Report

Adverse Ins. Claim #: See Police Report

Who was ticketed for the accident: Unknown

defendantclaimno: See Police Report

Person Ticketed Explanation: DEF fled the scene after the accident.

Passengers:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Injured: Yes

Injuries and Treatment: PC's husband is currently at the ER. He stated her neck and back are hurting.

From: Lauren McNeil
Sent: Friday, February 7, 2020 12:59 PM CST
To: [REDACTED]
CC:
Subject: Re: [REDACTED] SEMI ESIGN PENDING TX

Perfect. We won't follow up. I will continue to pull call and audit

Lauren V. Mingee
Founder & CEO
[Quintessa Marketing](#)

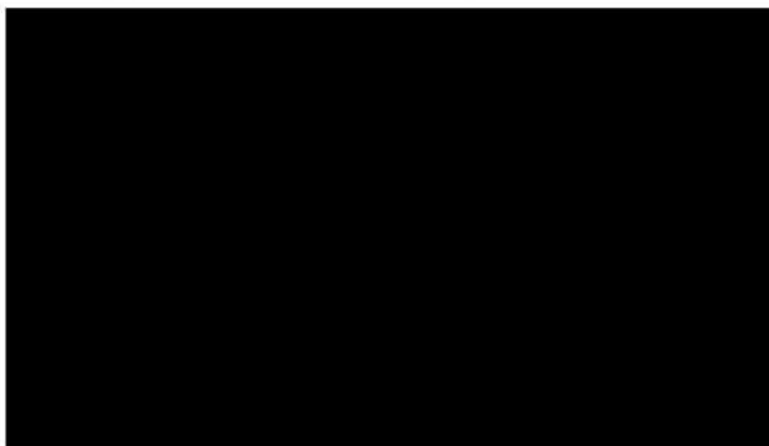
M: [405-443-9756](#)

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On Feb 7, 2020, at 12:58 PM, [REDACTED] wrote:

Lauren – Quick follow-up... Once we used our scripting to clarify who we are, and who we are not, this person *did* affirm he wanted to stay with our law firm. Just FYI.



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This message and any attachments may contain information that is confidential, privileged or exempt from disclosure.

From: [REDACTED]
Date: Friday, February 7, 2020 at 12:53 PM
To: Lauren McNeil <lauren@quintessamarketing.com>
Cc: [REDACTED]
Subject: FW: [REDACTED] SEMI ESIGN PENDING TX

Lauren,

Our intake team tells me this signed client thought he had hired Jim Adler even *after* signing our retainer *and* being warm-transferred to us.

You and I are likely on the same page regarding competitor conquest PPC, but we must go the extra mile to ensure there is no ambiguity or confusion about who we are, and who we are not, when a PNC calls on this sort of campaign. Please make this person's intake call recording available to us so we can review and discuss with you on Monday.

Best,



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On 2/7/20, 12:14 PM, "accidentintakeforms1@gmail.com" <accidentintakeforms1@gmail.com> wrote:

Resending with completed esign.

Intake Date/Time: 02/07/2020 10:45 AM

Case Summary: Accident happened on I-40 Mile 168 in Oklahoma but PC lives in Dallas, TX

DOI:02/07/2020

Injuries: PC has left ankle pain and is swelling. PC is wanting to be scene by doctor.

Liability: DEF tires fell off and flew at PC hitting his Semi. The steps on Semi broke off causing PC. Police arrived and cited DEF at fault.

Insurance:

PC- ACE American Insurance Company

DEF- See Police Report

Office #

(405)672-5517

PC First Name: Tarwah

PC Middle Name:

PC Last Name: Merchant

Case Type: Semi

[REDACTED]
PC SSN: X

[REDACTED]
PC Emergency Contact Name: Anthony (Family Member)

[REDACTED]
Incident Date: 02/07/2020

Incident Location: I-40 Mile 168 in Oklahoma

PC Insurance Company: ACE American Insurance Company

PC Ins. Claim #: Will Provide

Private Health Insurance: None

Was PC at fault?: No

Was PC injured?: Yes

Is PC Currently Pursuing Treatment?: No

If not, is PC willing to do follow-up treatment?: Yes

PC Vehicle Info (Year/Make/Model): Semi for Martin Transfer

PC Vehicle Location: At the scene of accident

Defendant Vehicle Info (Year/Make/Model): Semi

Investigating Police Dept: Will Provide

Police Report #: Will Provide

Injuries and Treatment: PC has left ankle pain and is swelling. PC is wanting to be scene by doctor.

Prior Attorney Name: None

Prior Settlement?: No

Property Damage Description: Will Provide but mostly front end damage

Property Damage Amount: 1500

Defendant Name: See Police Report

Adverse Insurance: See Police Report

Adverse Ins. Claim #: See Police Report

Who was ticketed for the accident: Defendant

defendantclaimno: See Police Report

Person Ticketed Explanation: See Police Report

From: Lauren McNeil
Sent: Friday, February 14, 2020 10:36 AM CST
To: [REDACTED]
CC: [REDACTED]; accidentintakeforms1@gmail.com; intake@quintessamarketing.com
Subject: Re: [REDACTED] MOTOR VEHICLE ACCIDENT ESIGN PENDING TX

We have it clarified and resent it over to Bianka

Lauren V. Mingee
Founder & CEO
[Quintessa Marketing](#)

M: [405-443-9756](#)

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On Feb 14, 2020, at 10:17 AM, [REDACTED] wrote:

Lauren - This PNC kept mentioning "Martillo Tejano" sending her to a clinic. Either she is represented by another firm, thinks she is represented by another firm - and they set up treatment. Or she only called on your PPC ad, your agent set her up with a clinic (unlikely), and she's just confused about who she called. Possibly some combination of all that.

Either way, we need this unraveled and clarified, or returned please.

Thanks!

